
**Responses of Barton Willmore
On Behalf Of MCA Developments Ltd
Respondent Number: 66194**

To Matter PM1 - Housing

May 2016

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ON BEHALF OF MCA DEVELOPMENTS LTD
RESPONDENT NUMBER: 66194

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(ON BEHALF OF MCA DEVELOPMENTS LTD, RESPONDENT NUMBER: 66194)
TO MATTER PM1 – HOUSING**

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PM1A.1: Does the further work on objectively assessed housing need (OAHN), carried out by Peter Brett Associates (PBA) for the Councils (RD/MC/040) ensure that the methodology used is now generally compliant with Planning Practice Guidance (PPG). NB Following their letter to the Councils of 29th March 2016 the Inspectors expect this to have been addressed through the preparation of a Statement of Common Ground, which will form the basis for the discussion of any areas of disagreement at the hearings.

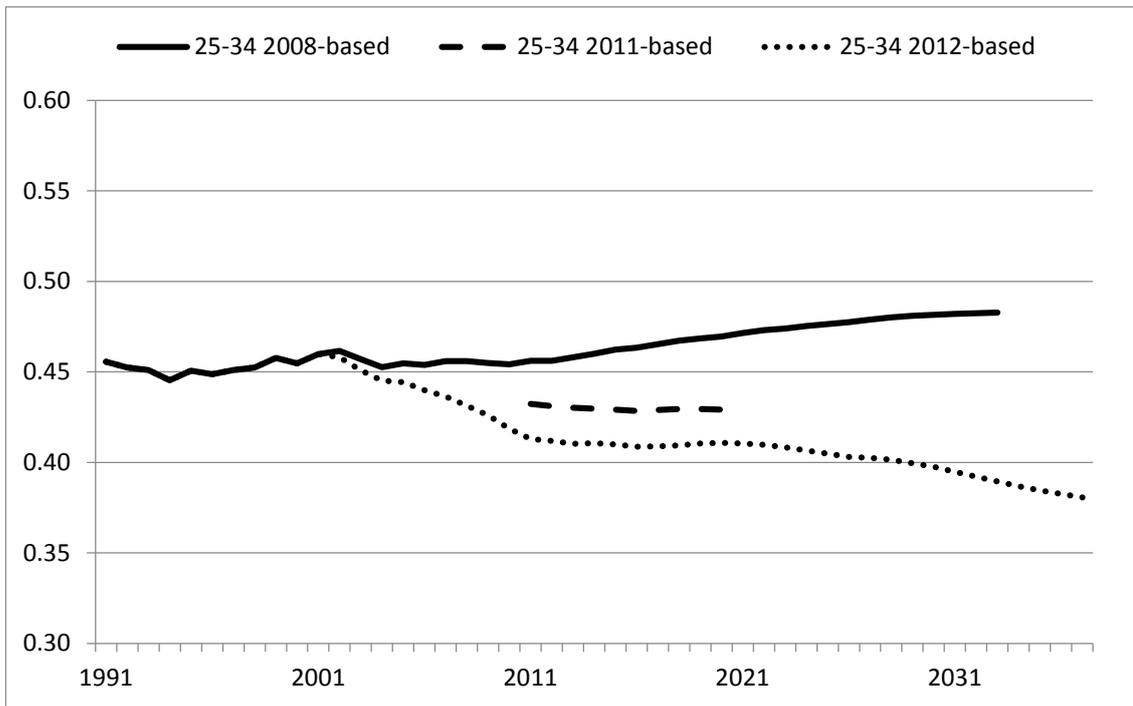
PM1A.2 Bearing in mind that PPG notes that no single approach will provide a definitive answer, do the OAHN figures of 14,000 new dwellings for Cambridge City and 19,500 new dwellings for South Cambridgeshire provide a robust basis to underpin the provision on new housing in the Local Plans. If not,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

- 1.1 Barton Willmore's (BW) response to issues PM1A.1, PM1A.2, PM1B.1, PM1B.2 and PM1B.3 are set out below, with additional detail provided in Appendix 1 (BW OAHN Technical Review report):

Household Formation Rates (HFRs)

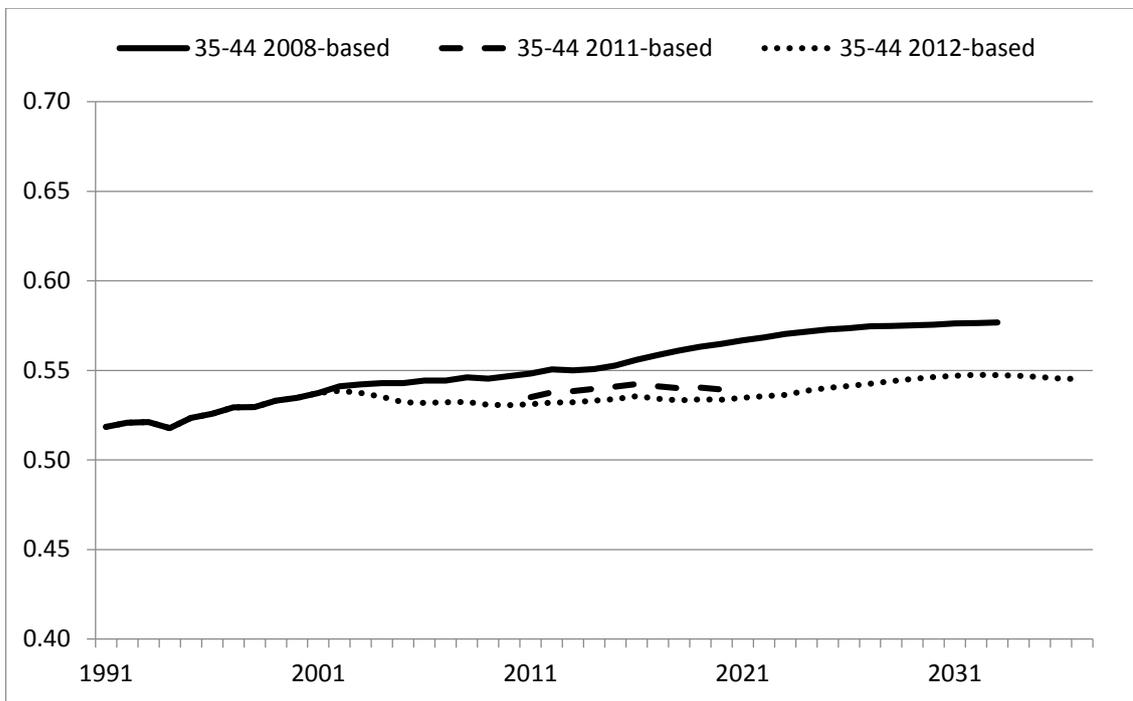
- 1.1 HFR assumptions are key in translating population to households. Applying suppressed HFRs leads to underestimated household growth and number of homes required. PPG ID2a-015 confirms that analysis of the latest HFRs is required in establishing OAHN. If necessary an upward adjustment is required if HFRs in the local area have been suppressed due to undersupply and/or the worsening affordability of housing.
- 1.2 RD/MC/40 considers no adjustment is necessary to the latest 2012-based CLG HFRs. BW disagree, as the latest 2012-based HFRs, like the interim 2011-based HFRs before them, incorporate clear suppression in the 25-34 age group, and to a lesser extent the 35-44 age group. This is illustrated in Figures 1 and 2 below:

Figure 1: HFR comparison, South Cambridgeshire District, 25-34 years of age



Source: CLG

Figure 2: HFR comparison, South Cambridgeshire District, 35-44 years of age



Source: CLG

- 1.3 The two comparisons clearly show that the 2012-based HFRs project suppressed HFRs for the two age groups over the Council's Plan period (2011-2031), when compared with the interim 2011-based series, and the pre recessionary 2008-based HFRs.

- 1.4 The interim 2011-based HFRs represented the first post-recessionary projection and were widely considered to project suppressed HFRs. The comparison set out above shows how the projected 2012-based HFRs are even lower than the interim 2011-based series, and are projected to fall even further in the 25-34 age group by 2031.
- 1.5 NPPF policies require a “significant boost” in housing supply, and “positively prepared” Local Plans. To base OAHN on unadjusted 2012-based HFRs across all age groups is considered flawed.
- 1.6 RD/MC/041 refers to work by Neil McDonald and Christine Whitehead regarding the 2012-based CLG household projections. However in the accompanying Town and Country Planning Association (TCPA) research project, ‘How Many Homes’ (Appendix 2), Christine Whitehead comments as follows:

“One of the biggest concerns is that couples aged between 25 and 34 – at the time when family formation is at its highest - are expected to be less well housed in 2031 than their counterparts in 2011. And if house building cannot be increased at least to the projected levels other household groups will find themselves in the same boat.”¹ (Our emphasis)

- 1.7 RD/MC/041 also refers to Planning Inspectorate decisions supporting the PBA approach to HFRs. However RD/MC/041 fails to refer to Inspectorate decisions where the suppression has been identified by Inspectors, and an upward adjustment supported.
- 1.8 The Arun Local Plan decision (Appendix 3) supported an adjustment to the 2012-based HFRs in the 25-34 age group, and importantly clarified the HFR adjustment should be a separate adjustment to a market signals adjustment:

“The (Council OAN) report’s upward adjustment of 26-28dpa (rounded to 25pa) should be added to the 820pa to assist an increase in household formation for the key 25-34 age group, mainly as a demographic adjustment.”² (Our emphasis)

¹ ‘We are only building half the homes we need – and younger people are suffering most, ‘How Many Homes’ press release, 04 November 2015, <http://www.tcpa.org.uk/resources.php?action=resource&id=1273>

² Paragraph 1.28, page 6, Inspector’s Arun Local Plan OAN Conclusions, ID18, 02 February 2016

- 1.9 The Cornwall Local Plan Inspector (Appendix 4) also considered an adjustment was necessary, and that a projection based on suppressed HFRs conflicted with the NPPF. The Inspector considered a 'blended' approach between the 2012 and 2008-based HFRs to be the most robust approach:

"the HR 2012 may still embed some recessionary effect. It would be inconsistent with the national policy for growth to project any such effect throughout the plan period. Accordingly, the projections developed as part of this further update should show both the HR 2008 and HR 2012 and the mid-point, blended approach. On the current evidence, I consider that the most robust approach for deriving the housing requirement would be a projection using a blended HR rate."³

- 1.10 The West Oxfordshire Local Plan Inspector (Appendix 5) concluded the 2012-based household projections "may well reflect some suppression" in the 25-34 age group. In suspending the EiP for further work on the OAHN to take place he concluded as follows in respect of HFRs:

"in any further work the Council should be mindful that a demographic starting point of around 490 dpa may be embedding some suppression of household formation." (our emphasis) ⁴

- 1.11 It is important to note how 490 dpa in West Oxfordshire was reflective of a 10-year net-migration scenario, based on 2012-based HFRs across all age groups with no adjustment. For West Oxfordshire the 10 year net-migration scenario represented an uplift from the starting point estimate of the 2012-based household projections.
- 1.12 To comply with NPPF policies and PPG guidance, an upward adjustment is required, particularly in the 25-34 age group, but also in the 35-44 age group.

³ Paragraph 3.8, page 7, Cornwall Local Plan Strategic Policies - Examination Preliminary Findings Following the Hearings in May 2015, 05 June 2015

⁴ Paragraph 4.11, page 6, West Oxfordshire Local Plan Examination Inspector's Preliminary Findings – Part 1 (IN 015), 15 December 2015

Balancing homes and jobs

1.13 Paragraph 158 of the NPPF states:

“local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.” (our emphasis)

1.14 Paragraph 21 states:

“Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing.” (our emphasis)

1.15 It is clear that economic growth is a relevant consideration in determining OAHN. PPG ID2a-018 complements these policies by stating how OAHN should balance the economically active (labour force supply) with projected job growth, and then determine the number of homes required to house the labour force.

1.16 RD/MC/040 does not consider this element of OAHN, on the basis of the 2013 SHMA for Cambridgeshire already doing so. However RD/MC/40 confirms the SHMA's approach failed to balance homes with jobs if South Cambridgeshire and Cambridge City were considered in isolation.⁵

1.17 Instead, a policy-on decision of increased commuting from the surrounding HMA provides the balance between homes and jobs. This does not comply with OAHN methodology. The Oadby & Wigston High Court judgement (Appendix 6) confirmed how changing commuting rates to suit a strategy or policy approach between authorities is a policy-on assumption.⁶ To ensure a policy-off OAHN assessment, the commuting ratio should be held constant at most recently recorded levels. For South Cambridgeshire this is a net out-commuting ratio (1.06) meaning that for every 100 jobs, 106 labour force participants would be required.

⁵ Paragraph 3.50 (iii), page 29, RD/MC/40

⁶ Paragraph 34 (i), page 13, High Court Judgement between Oadby & Wigston Borough Council and (1) Secretary of State for Communities and Local Government (2) Bloor Homes Limited, 03 July 2015

- 1.18 Furthermore the SHMA was published in May 2013 and more recent economic forecasts are now available. Demographic modelling in the Essex Planning Officers Association (EPOA) Phase 7 report (May 2015), based on the East of England Forecasting Model (EEFM) job forecasts (January 2015), shows jobs-led OAN between 1,073 and 1,125 dwellings per annum (dpa) for South Cambridgeshire, based on the 2012-based HFRs and the 2008-based HFRs respectively (see Table 4.1 of Appendix 1 and Appendix 7).
- 1.19 However it is important to note how the EPOA scenario also assumes a reduction in net out-commuting, from 1.06 in 2013 to 1.00 in 2031. A constant 2011 Census commuting ratio of 1.06 would result in a higher range. Notwithstanding this the EPOA assessment shows how jobs-led OAN requires at least an additional 100 dpa in South Cambridgeshire (2,000 in total).
- 1.20 A minimum of 1,073 dpa, 2011-2031, is considered to represent economic-led OAHN. However more up-to-date employment forecasts and a constant commuting ratio have the potential to require a higher jobs-led OAHN.

Market Signals

- 1.21 RD/MC/40's uplift to the starting point estimate is 10% in total. BW consider that an uplift of at least 10% is required solely for market signals pressure in South Cambridgeshire. This should be applied in addition to demographic and economic uplifts discussed above.
- 1.22 As referred to above, the Arun Local Plan Inspector's decision confirms the market signals uplift should be separate to the demographic-led adjustment. As discussed above, BW's view is that an uplift should be applied to alleviate suppressed household formation in younger age groups, as a first step. This would increase the starting point estimate of 879 dpa. As a second step, a further 10% uplift for market signals pressure would increase the OAHN to a figure above PBA's recommended OAHN of 975 dpa before any additional uplift for economic growth.
- 1.23 RD/MC/40 refers to the Eastleigh Local Plan Inspector's report, and 10% uplift for market signals. It is important to note how this uplift for market signals was also made in addition to demographic adjustment.⁷

⁷ Paragraphs 39-41, Eastleigh Borough Local Plan Inspector's Report, February 2015

- 1.24 Furthermore the Eastleigh Inspector recommended a 'cautious' approach which he considered to equate to a 10% uplift based on 'modest' market pressure.⁸ BW consider there is evidence to suggest market signals pressure in South Cambridgeshire that is more than just 'modest' (see paragraphs 4.19 to 4.30 of Appendix 1).

Summary

- 1.25 In summary, and for the reasons set out above, RD/MC/040 is not considered to comply with ID2a of the PPG, nor is OAHN of 19,500 homes, 2011-2031 (975 dpa) for South Cambridgeshire considered to represent a robust basis to underpin housing provision in the Local Plan.
- 1.26 BW have not undertaken bespoke demographic modelling to assess the impact of the adjustments we consider appropriate for suppressed HFRs, market signals pressure, and economic growth. The application of such adjustments would lead to OAHN of at least 1,073 dpa, 2011-2031, and potentially significantly higher.

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

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

- 1.27 In the absence of a Joint Plan, between local authorities, we see little if any justification for the use of a joint trajectory. Section 28 of the Planning and Compulsory Purchase Act 2004 enables two or more local planning authorities to agree to prepare a joint Local Plan, which can be an effective means of addressing cross-boundary issues, sharing specialist resources and reducing costs (e.g. through the formation of a joint planning unit). Therefore if there are indeed local circumstances to justify the use of a joint trajectory, local planning authorities from the early stages of the process should have made the decision to prepare a joint local plan.

⁸ Paragraph 41, Eastleigh Borough Local Plan Inspector's Report, February 2015

- 1.28 The decision of South Cambridgeshire and Cambridge City to combine their trajectories was clearly a reaction to the outcome of two planning application appeals at Waterbeach, which were allowed in 2014 on the basis that South Cambridgeshire District Council could not demonstrate a 5-year housing land supply, as required by the NPPF. Therefore in this case, the primary flaw in the approach is that it is contrived. The Memorandum of Understanding between the City and SCDC appears to mainly exist because, given its track record, it is now necessary for South Cambridgeshire to amalgamate its future housing delivery with that of a more successful authority in order to avoid the need for a step change in its long term spatial strategy of rural restraint and to avoid the requirement to allocate further sites at the larger settlements.
- 1.29 The duty to cooperate requires local planning authorities and certain other public bodies to cooperate with each other in preparing a Local Plan, where there are matters that would have a significant impact on the areas of two or more authorities. A joint Local Plan is one means of achieving this and those preparing Joint Plans will very likely prepare a joint evidence base and assessment of development needs. In terms of joint working, Paragraph 007 (Reference ID: 12-007-20140306) of the PPG states that:
- “Less formal mechanisms can also be used. In particular, local planning authorities should consider the opportunities for aligning plan timetables and policies, as well as for sharing plan-making resources”**
- 1.30 Importantly these “less formal mechanisms” do not extend to the use of a joint trajectory and although aligned plans have been produced in some areas, for example the Nottinghamshire city region, they have not used joint trajectories.
- 1.31 We note that our concerns relating to the use of the joint trajectory are also shared by Inspector appointed to preside over the planning appeal made in relation to the proposed development of 30 new dwellings on land off Boxworth End, Swavesey. The appeal was allowed in 12th May 2016 (appeal reference: APP/W0530/W/15/3139078) and a copy of the decision is contained at Appendix 8.
- 1.32 With regards to the materiality of the Memorandum of Understanding and the calculation of a five year housing land supply the Inspector referred back to the decision of his colleague in the Waterbeach appeals, which made clear that paragraph 47 of the NPPF is directed to each Local Planning Authority and this is not a case where a joint Local Plan has been submitted for consideration. In agreeing with the assessment of his colleague, the Inspector at paragraph 20 of his report concluded that ‘there is a requirement that

each Local Planning Authority individually needs to show a five-year supply of housing land'. As such the use of a joint trajectory would be completely counterintuitive in the context of boosting the supply of housing and does not accord with the spirit of the NPPF.

- 1.33 As set above, if local circumstances genuinely justify the need for a joint trajectory the two authorities should have worked together to produce a joint local plan. Only through the preparation of a Joint Local Plan could both Council's ensure transparency and clarity in terms of the supply and delivery of sites across the two authorities.

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

- 1.34 As articulated through our representations to the South Cambridgeshire Local Plan Proposed Modifications Joint Consultation, MCA have significant objections to the proposed modification of Policy S/6 to incorporate the joint housing trajectory, which will only serve to exacerbate the supply of housing in South Cambridgeshire.
- 1.35 As stated at paragraph 1.28 above, the primary flaw in the approach is that it is contrived, as the MOU appears to mainly exist because, it is necessary for South Cambridgeshire to amalgamate its future housing delivery with that of a more successful authority. As rightly pointed out by the Inspector in the Swavesey Appeal, the intentions of paragraph 47 of the NPPF are clear, Local Planning Authorities should identify a supply of deliverable sites to provide five years worth of housing against their own housing requirements. It is clear that the use of a joint trajectory will not fulfil the objectives of the Framework. Rather the MOU is more likely to impede the timely delivery of housing sites over the Plan period.
- 1.36 A second fundamental flaw is that the Greater Cambridge Housing Trajectory places a reliance on Cambridge to deliver a greater percentage of the dwellings in the first five years when SCDC will be deficient. Such an approach however belies the huge disparity between land values in parts of South Cambridgeshire district and the principal locations where development will take place in Cambridge, where in some cases, land values are nearly double.
- 1.37 Given the current level of house price inflation in Cambridge City, we strongly object to an approach where South Cambridgeshire district expects to export its unmet housing needs into a significantly more expensive HMA. Based on the test of soundness set out in

the NPPF such a strategy to housing delivery cannot be reasonably considered positively prepared or justified.

APPENDIX 1

BARTON WILLMORE OAHN TECHNICAL REVIEW, MAY 2016

SOUTH CAMBRIDGESHIRE DISTRICT
OBJECTIVE ASSESSMENT OF HOUSING NEED
EVIDENCE BASE

TECHNICAL REVIEW

May 2016

SOUTH CAMBRIDGESHIRE DISTRICT
OBJECTIVE ASSESSMENT OF HOUSING NEED EVIDENCE BASE
TECHNICAL REVIEW

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1.0 INTRODUCTION

1.1 This updated Technical Review of the housing evidence base for South Cambridgeshire District Council has been prepared by Barton Willmore on behalf of MCA Developments Ltd. The review has been undertaken in the context of the requirements of the National Planning Policy Framework (NPPF), which at paragraph 159 states that:

“Local planning authorities should have a clear understanding of housing needs in their area. They should:

Prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:

- **meets household and population projections, taking account of migration and demographic change;**
- **addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and**
- **caters for housing demand and the scale of housing supply necessary to meet this demand.”**

1.2 Furthermore, our review focuses on the methodological approach which should be applied in the production of the SHMA, in the context of the Planning Practice Guidance (PPG) requirements. This review is structured as follows:

Section 2 provides a summary of the relevant policy set out in the National Planning Policy Framework (NPPF), the Planning Practice Guidance (PPG), and relevant Local Planning Policy;

Section 3 summarises the latest official ONS and CLG projections and estimates in the context of the Council's proposed housing target;

Section 4 reviews the content of the Council's housing evidence base in accordance with national policy and guidance, as follows:

- **Objectively Assessed Housing Need: Further Evidence (PBA, November 2015);**
- **Essex Planning Officers Association Phase 7 Report (May 2015).**

Section 5 evaluates the proposed housing target of the Proposed Modifications to the Local Plan in the context of the publicly available information presented in this technical paper.

2.0 PLANNING POLICY CONTEXT

A) NATIONAL PLANNING POLICY

i) Introduction

2.1 The National Planning Policy Framework (NPPF, 27 March 2012) and the accompanying Planning Practice Guidance (PPG, 06 March 2014) set out the requirements within which local planning authorities should be setting their overall housing targets as part of a full objective assessment of overall need. These requirements are summarised below.

ii) National Planning Policy Framework (27 March 2012)

2.2 In respect of housing requirements, the NPPF states the following:

- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
 - **any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or**
 - **specific policies in this Framework indicate development should be restricted.**¹
- Local authorities should significantly boost the supply of housing and should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area.²

2.3 More detail as to how 'objectively assessed needs' should be established is set out in the 'Plan-making' section of the NPPF. This section states the following:

- Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.³

¹ Paragraph 14, National Planning Policy Framework, 27 March 2012;

² Paragraph 47, National Planning Policy Framework, 27 March 2012;

³ Paragraph 158, National Planning Policy Framework, 27 March 2012;

2.4 To ensure the full objective assessment of overall housing need is undertaken, paragraph 159 of the SHMA states the following:

“Local planning authorities should have a clear understanding of housing needs in their area. They should:

- **prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries; The SHMA should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:**
 - **meets household and population projections, taking account of migration and demographic change;**
 - **addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes).”⁴**

2.5 Furthermore, the NPPF states how the local planning authority should submit a plan which is ‘sound’; namely that it is:

“Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.”⁵

iii) Planning Practice Guidance (PPG, 06 March 2014)

2.6 PPG was issued as a web based resource on 6th March 2014. Guidance on the assessment of housing development needs (PPG ID: 2a) includes the SHMA requirement set out in NPPF.

2.7 The assessment of need is introduced as an objective assessment based on facts and unbiased evidence to which constraints should not be applied (2a-004). The area assessed should be the housing market area (2a-008), reflecting the key functional linkages between places where people live and work (2a-010).

2.8 The PPG methodology for assessing overall housing need (2a-014:029), summarised below, commences with a starting point estimate of overall housing need.

⁴ Paragraph 159, National Planning Policy Framework, 27 March 2012;

⁵ Paragraph 182, National Planning Policy Framework, 27 March 2012;

Starting Point Estimate

- 2.9 The household projections published by the Department for Communities and Local Government (CLG) provide the starting point estimate of overall housing need. CLG household projections are trends based and may require adjustment to reflect factors, such as unmet or suppressed need, not captured in past trends (2a-015).
- 2.10 The latest household projections (CLG 2011-based interim) only cover the period up to 2021; therefore an assessment of likely trends after 2021 is required to align with development plan periods (2a-016).
- 2.11 Whether on an adjustment to the starting point estimate is required depends on the results of three discreet tests.

Test 1 - Adjusting for Demographic Evidence

- 2.12 Adjustments to household projection-based estimates of overall housing need should be made if justified on the basis of established sources of robust demographic evidence, such as the latest projections and population estimates published by ONS. Adjustments might include alternative/ updated components of change and household formation rates (2a-017).

Test 2 - Adjusting for Likely Change in Job Numbers

- 2.13 In addition to demographic evidence, job trends and or forecasts should also be taken into account when assessing overall housing need. The implication is that housing numbers should be increased where this will enable labour force supply to match projected job growth (2a-018).

Test 3 - Adjusting for Market Signals

- 2.14 The final test is concerned with market signals of quantity and price. A worsening trend in any indicator will require an upward adjustment the starting point estimate of overall housing need. Particular attention is given to the issue of affordability. The more significant the affordability constraints, the larger the additional supply response should be (2a-019:20).

Overall Housing Need

- 2.15 An objective assessment of overall housing need is therefore a test of whether the household projection based starting point can be reconciled with a) the latest demographic evidence, b)

the ability to accommodate projected job demand, c) the requirement to address worsening market signals. If it cannot be reconciled, then an adjustment should be made.

2.16 The extent of any adjustment should be based on the extent to which it passes each test. That is:

- It will at least equal the housing need number implied by the latest demographic evidence;
- It will at least accommodate projected job demand; and,
- On reasonable assumptions, it could be expected to improve affordability.

Assessing Affordable Housing Need

2.17 In summary, PPG advises that total affordable need is estimated by subtracting total available stock from total gross need (2a-022:029). Whilst it has no bearing on the assessment of overall housing need, delivering the required number of affordable homes can be used to justify an increase in planned housing supply (2a-029).

iv) South Cambridgeshire Submission Local Plan (July 2013) and Proposed Modifications (November 2015)

2.18 Policy S/5: 'Provision of New Jobs and Homes' of the Submission Local Plan for South Cambridgeshire states the following:

"Development will meet the objectively assessed needs in the district over the period 2011-2031 for:

a. 22,000 additional jobs to support the Cambridge Cluster and provide a diverse range of local jobs;

b. 19,000 new homes, including affordable housing and 85 Gypsy & Traveller pitches."⁶

2.19 The evidence of objectively assessed need (OAN) is set out in the 2012 SHMA as identified in the supporting text to Policy S/5, which also reads as follows:

"The SHMA identifies a need for 19,000 new homes in South Cambridgeshire by 2031. This takes account of natural change in the existing population, including demographic changes such as an ageing population, having regard to the latest information available, including the Census 2011. It also takes account of

⁶ Policy S/5: Provision of new jobs and homes, page 25, Proposed Submission South Cambridgeshire Local Plan, July 2013

forecast migration to South Cambridgeshire to support growth in the local economy.”⁷

- 2.20 The South Cambridgeshire Local Plan was submitted for examination in March 2014. In response to issues raised by the Inspector, the ‘Objectively Assessed Need: Further Evidence Study’ was undertaken and published by PBA in November 2015. The study concluded there should be a total uplift of 10% to the starting point estimate of OAN (the 2012-based CLG household projection) in South Cambridgeshire to meet OAN. On this basis, the study concluded that the OAN for South Cambridgeshire area should be increased to 19,337 homes, 2011-2031 (967 homes per annum).
- 2.21 As a consequence, The Modifications Consultation Report proposes an amendment (PKM/SC/2/H) to Policy S/5 to increase the housing requirement for South Cambridgeshire from 19,000 to 19,500 homes, 2011-2031 (975 homes per annum). We assess whether this target meets full OAN in the following section of this report.

v) Summary

- 2.23 As we have set out above, the NPPF and supporting PPG state how a full OAN should be set out in an up-to-date Strategic Housing Market Assessment (SHMA). The SHMA should provide the following:
- A full unconstrained objective assessment of overall housing need across the relevant housing market area in line with the duty to cooperate;
- 2.24 As part of this full objective assessment of overall housing need, the SHMA should consider the following:
- Demographic and economic led scenarios for overall housing need in the HMA;
 - Affordable housing need (backlog and newly arising need);
 - The implications of market signals (affordability, house prices, rents, rate of development, overcrowding, and land prices) on overall housing need;
- 2.25 In the following section of this technical review we summarise the content of the South Cambridgeshire evidence base and specifically its assessment of overall housing need in South Cambridgeshire, in the context of the NPPF and PPG requirements set out above.

⁷ Paragraph 2.37, Policy S/5: Provision of new jobs and homes, page 25-26, Proposed Submission South Cambridgeshire Local Plan, July 2013

3.0 HOUSEHOLD DEMOGRAPHICS

i) Introduction

3.1 This section reviews the latest official population projections by the Office for National Statistics (ONS), and household projections by the Department for Communities and Local Government (CLG) for South Cambridgeshire District (SCD). These form the starting point in establishing full OAN for SCD in line with paragraph 159 of the NPPF, and the 'Housing and Economic Development Needs' section of the PPG (ID2a).

ii) Office for National Statistics (ONS) Population Projections

3.2 Historic ONS Sub National Population Projections (SNPP) for SCD are set out in Table 3.1 (below). The 2012-based SNPP shows a slightly lower projection than the previous 'interim' 2011-based projection, however projected population growth remains significant.

Table 3.1: ONS Population Estimates and Projections for South Cambridgeshire, 2011-2021 & 2011-2031

	2011	2016	2021	2026	2031	2011-2021 (per annum)	2011-2031 (per annum)
2008-based	147,800	156,700	165,400	173,300	180,100	17,600 (1,760)	32,300 (1,615)
2011-based (interim)	149,800	161,500	171,900	N/A	N/A	22,100 (2,210)	N/A
2012-based	149,800	159,200	168,700	176,600	182,900	18,900 (1,890)	33,100 (1,655)

Source: Office for National Statistics (rounded to nearest hundred) Note: Figures may not sum due to rounding

3.3 The 2012-SNPP should be treated with caution for the following reasons. The 2012-SNPP replace the interim 2011-based SNPP with a 25 year trend based population projection. The 2012 SNPP are based on past short term trends in migration and population change, and as such are heavily influenced by the recessionary period (2007-2012). They are therefore considered to be prudent in scope.

3.4 Furthermore, the 2012-based SNPP are constrained to the 2012 National Population Projections published in 2013. The ONS has recently released the 2014-based National Population Projections, which will underpin 2014-based SNPP (to be published in May 2016). However both sets of national projections significantly underestimate the levels of net international migration recorded by the ONS, as reported in the quarterly migration estimates release.

- 3.5 Importantly, the latest UK international migration estimates from ONS (February 2016) show 323,000 net international migrants to the year ending September 2015, whereas the 2012 National Population Projections, and therefore the 2012-based ONS SNPP and 2012-based CLG household projection, is underpinned by only 165,000 net migrants people per annum. Clearly, therefore, the 2012-based SNPP figures are an underestimate of net international migration across the country. This filters down to local authority level.
- 3.6 Working age population is also a significant consideration in the context of SCD's requirement to increase job growth by 22,000 over the Plan period (2011 to 2031). From reference to the detailed output of the 2012-based SNPP, they project an increase in the working age (16-64) population of approximately 9,900 people over the period 2012-2031. Although this is an increase, it is significantly lower than the planned increase in job growth (22,000 new jobs). Modelling indicates that 23,320 people would be needed to fill 22,000 new jobs due to the existing net out-commuting ratio of 1.06. On this basis, the 2012 SNPP and therefore the 2012 CLG household projection, would wholly fail to meet the clear economic growth aspirations of the draft Plan.
- 3.7 For the reasons outlined above, the 2012-based SNPP should therefore be treated with caution.

iii) Communities and Local Government (CLG) household projections

- 3.8 As Table 3.2 (below) shows, the latest 2012-based CLG household projections show growth of 914 households per annum, 2011-2021, and growth of 853 households per annum, 2011-2031 in SCD. To reach a dwelling requirement, account needs to be taken of vacancy rates and second homes (2.96% in South Cambridgeshire). This would lead to a dwelling requirement of 941 dwellings per annum, 2011-2021 and 878 dwellings per annum, 2011-2031.

Table 3.2: CLG Household Projections for South Cambridgeshire, 2011-2021 & 2011-2031

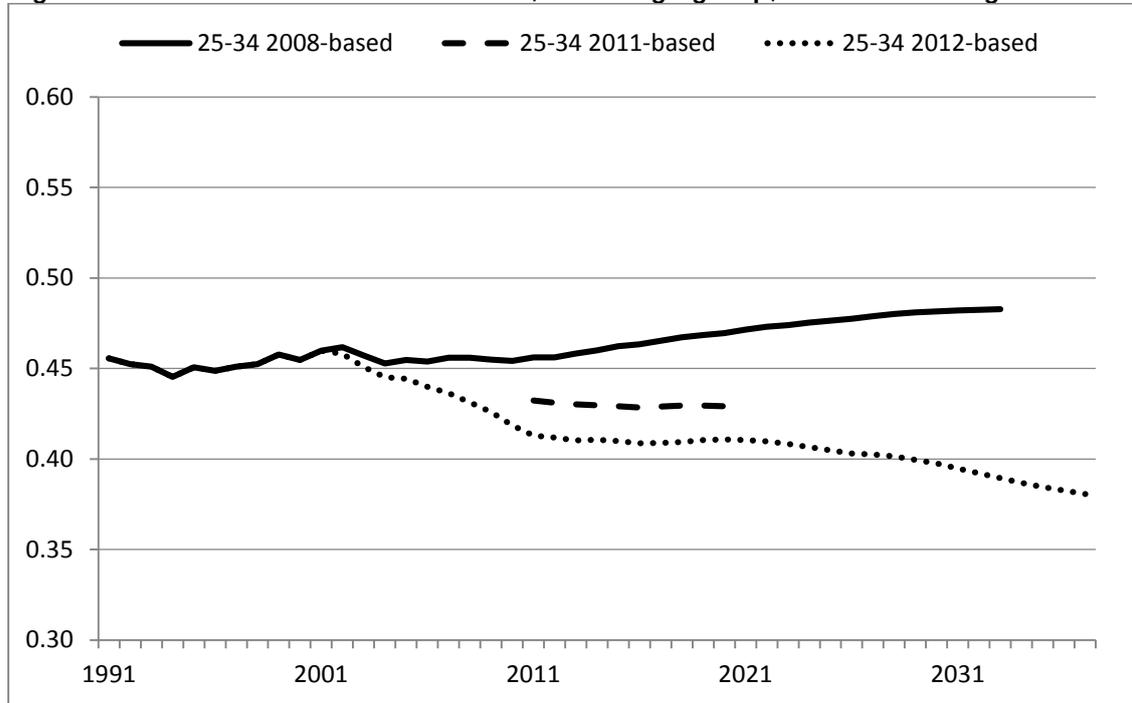
	2011	2016	2021	2026	2031	2011-2021 (per annum)	2011-2031 (per annum)
2008-based	60,756	65,526	70,325	74,841	78,961	9,569 (957)	18,205 (910)
Interim 2011-based	60,401	65,565	70,117	-	-	9,716 (972)	-
2012-based	60,404	65,060	69,541	73,656	77,456	9,137 (914)	17,052 (853)

Source: (CLG) Communities and Local Government.

- 3.9 As the PPG states (see Paragraph 2.9), CLG household projections should form the 'starting point estimate' only of overall housing need as part of a full objective assessment of need. It is important that adjustments, for example, to reflect employment growth, suppressed household formation rates, affordable housing need, and recognition of key market signals are considered and, where appropriate, amendments are made to the CLG projections in order to determine a more realistic estimate of housing need. The implications of these adjustments are considered in Section 4 of this study.
- 3.10 It is important to understand how the previous 'interim' 2011-based CLG household projections were widely accepted as being underpinned by recessionary trends in household formation, projecting forward concealed households created by these recessionary trends. For the latest 2012-based figures, this same point remains valid. For example, the 2012-based household projections show suppression in the 25-34 and 35-44 age groups, the ages most likely to be first time buyers. This is shown graphically in Figures 3.1 and 3.2 below.
- 3.11 A return to pre recessionary conditions over the Plan period would therefore necessitate significantly higher figures than the 941 dwellings per annum (2011-2021) and 878 dwellings per annum (2011-2031), the latter of which is the CLG 'starting point' representing demographic-led need in South Cambridgeshire.
- 3.12 Figures 3.1 and 3.2 illustrate how both the 'interim' 2011-based and 2012-based CLG household formation rates suppress household formation, compared with the pre recessionary 2008-based formation rates, particularly in younger age groups. In the case of South Cambridgeshire, the graphs show how the latest 2012-based CLG projections are underpinned by higher suppression than the previous interim 2011-based series.
- 3.13 It is not expected that the recessionary trends underpinning the interim 2011-based and 2012-based CLG household projections will continue in the long-term, nor is it considered prudent

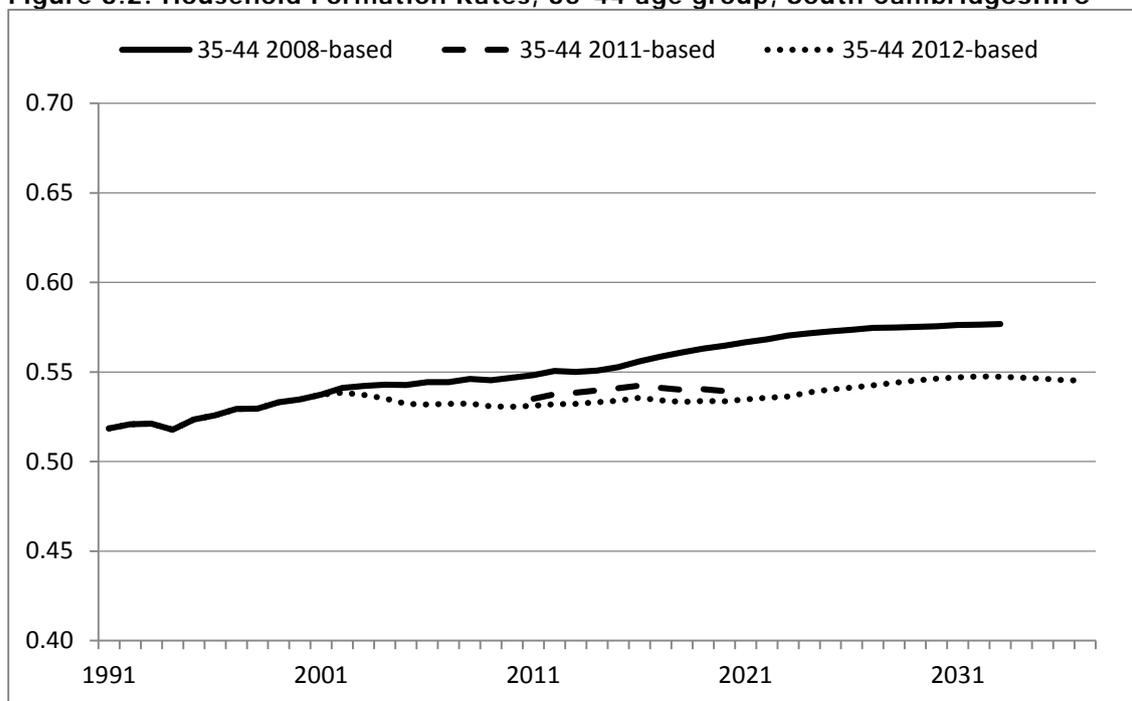
to plan on the basis of suppressed household formation in younger age groups over a 15 to 20-year period, particularly in the context of the NPPF’s aspirations to ‘boost significantly the supply of homes’, ‘promote economic growth’ and ‘positively prepare’ Local Plans.

Figure 3.1: Household Formation Rates, 25-34 age group, South Cambridgeshire



Source: CLG

Figure 3.2: Household Formation Rates, 35-44 age group, South Cambridgeshire



Source: CLG

3.14 Whilst the SCDC figure of 975 dwellings per annum (total of 19,500) over the period 2011-2031 is higher than the CLG 'starting point' of 878 homes per annum, in order to provide a full objective assessment of overall housing need in line with the PPG, economic-led growth, affordable housing provision, and market signals must also be considered in addition to the 'starting point'. As the analysis presented in this study shows, alleviating the suppressed household formation rates of the 2012-based CLG projection would increase the starting point of 878 dwellings per annum, 2011-2031.

iv) ONS Estimates of Net Migration

3.15 Net-migration is one of the key components of population change in South Cambridgeshire District and the most recent levels of net migration are shown in Table 3.3.

Table 3.3: ONS Estimates of Net Migration: South Cambridgeshire District

Year	Net Migration
04/05	1,266
05/06	1,409
06/07	1,673
07/08	1,450
08/09	1,492
09/10	1,632
10/11	1,317
11/12	607
12/13	690
13/14	1,152
2004-2014 1,269 (Annual Average)	
2009-2014 1,080 (Annual Average)	

Source: ONS

3.16 The figures in Table 3.3 show a trend of significant net in-migration to the District over the past decade, both in the short-term (5 years) and long-term (10 years). These trends compare with average net in-migration of only 1,037⁸ people per annum projected forward by the 2012-based ONS SNPP.

3.17 It is also important to note that the most recent 2013/2014 figure of 1,152 is more comparable to the 10 year average (2004-2014) figure of 1,269, which suggests that the figures of 607 (2011/2012) and 690 (2012/2013) were slightly anomalous, especially when compared to the ONS estimates for the period 2004-2011.

⁸ The figure of 1,037 is derived from the ONS 2012 SNPP Components of Change (migration only) spreadsheet. It is the average of the figures covering the period 2012/2013-2030/2031.

- 3.18 It is therefore considered that the 2012-based ONS SNPP is underpinned by lower levels of net-migration than past long-term trends show. Barton Willmore consider it more prudent and representative to use the long-term trend, due to the 10-year period covering years of economic buoyancy and recession. The short-term trend remains heavily influenced by the recession and is not considered as robust.
- 3.19 The difficulties in using data which covers the recession are well documented in the PAS Technical advice note – Objectively Assessed Need and Housing Targets produced by PBA in July 2015. Paragraph 6.23 of the advisory note states that:

‘The base period used in the latest official projections, 2007-2012, is especially problematic. The period covers all of the last recession, in which migration was severely suppressed as many households were unable to move due to falling incomes and tight credit. Therefore the official projections may underestimate future migration – so that they show too little population growth for the more prosperous parts of the country, which have been recipients of net migration in the past. If so, by the same token the projections will also overestimate population growth for areas with a history of net out migration.’

- 3.20 For these reasons, the advisory note states that when assessing housing need, it is advisable to use a longer reference period. A 10 year time frame should provide more stable and more robust projections than simply using the ONS five years.

v) Housing Completions

- 3.21 Table 3.4 (below) sets out net completions for South Cambridgeshire over the past decade. We have included them in this section of the report to outline the effect the lack of delivery will have had on demographic change.

Table 3.4: South Cambridgeshire – Net Completions vs Development Plan targets, 2004-2014

Year	Net Completions	Requirement	Shortfall/Overprovision
04/05	571	1,176*	-605
05/06	877	1,176	-299
06/07	924	1,176	-252
07/08	1,274	1,176	+98
08/09	610	1,176	-566
09/10	611	1,176	-565
10/11	656	1,176	-520
11/12	678	950**	-272
12/13	559	950	-391
13/14	636	950	-314
03/04-13/14	740	1,108	-3,680

Source: South Cambridgeshire District Annual monitoring Report, 2013/14.

Notes: * Core Strategy Annualised requirement over 17 years.

** Submission Local Plan annualised over 20 years

3.22 As Table 3.4 shows, there has been significant under-provision (averaging -368 dpa) in the District over the past decade. This trend would have had an effect on the propensity of people to migrate into the District, playing a significant role in inhibiting the level of net in-migration to the District over the same period. Delivery in line with development targets would have therefore resulted in an increase to the trends outlined above, and the long-term trend of 1,269 people per annum is therefore considered a prudent assumption to inform demographic-led OAN.

vi) Summary

3.23 In summary, this section has considered official ONS and CLG projections; i.e. the PPG 'starting point' in fully assessing overall housing need in South Cambridgeshire District. The main points to note are as follows:

- The 'starting point estimate' of overall housing need for South Cambridgeshire District is 853 households per annum, equating to 878 dwellings per annum; 10% lower than the draft plan target (975 dwellings per annum);
- However, growth of 853 households per annum, (878 dwellings per annum) could represent a significant underestimate due to the recessionary based 2012-based household formation rates they are underpinned by;

- The 2012-based ONS SNPP is the latest official population projection available. However it is considered to underestimate population growth over the Plan period due to the migration assumptions (1,037 people per annum) it is underpinned by, compared with the short term and long term trend experienced (1,080 and 1,269 people per annum respectively). The long-term trend is considered the most robust measure to apply to the determination of demographic-led OAN;
- Significant under-delivery (-368 dwellings per annum average, 2004-2014) against targets would have suppressed net in-migration;
- The 2012-based ONS SNPP will only grow the working age population (16-64) by 9,900 people, 2012-2031; significantly lower than the level of job growth aspired to (22,000 jobs 2011-2031). Application of the 2011 Census commuting ratio (1.08) shows how working age/ labour force of 23,760 people will actually be needed to ensure unsustainable commuting patterns are not exacerbated;
- To grow the population and housing to support the job growth aspired to, significantly higher household growth than that created by the 2012-SNPP would be needed.

3.24 For the purposes of the full objective assessment of need, the demographic starting point is therefore 878 dpa, 2011-2031 (as highlighted above). However, adjustment for suppressed household formation rates and more representative net-migration rates would significantly increase the level of housing need required to meet demographic-led growth.

3.25 In the following section of this report we consider the analysis set out above in the context of the Council's revised OAN evidence.

4.0 SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL EVIDENCE CRITIQUE

A) INTRODUCTION

4.1 This section provides a technical review of the evidence base underpinning the revised housing target of 19,500 dwellings 2011-2031, as set out in the Council's Proposed Modifications to the Local Plan.

4.2 Specifically we address the findings of the following documents.

- Objectively Assessed Housing Need: Further Evidence (PBA, November 2015);
- Technical Report on Population, Housing, and Employment Forecasts (Cambridgeshire County Council, May 2013);
- Strategic Housing Market Assessment (2012 and 2013 Update);

4.3 We focus on the PBA report, which has been published in the intervening period between Barton Willmore's previous technical report (November 2015) and the publication of the Council's proposed modifications.

4.4 In addition the Greater Essex Demographic Forecasts 'Stage 7' report by the Essex Planning Officers Association is summarised. This provides the most recent demographic and economic led scenarios for growth in South Cambridgeshire.

B) OBJECTIVELY ASSESSED HOUSING NEED: FURTHER EVIDENCE (PBA, NOVEMBER 2015)

4.5 The PBA report was published following the comments of the Planning Inspector who examined the submitted Local Plan for South Cambridgeshire. Specifically, PBA state how their report addresses demographic led need and the impact of worsening market signals only. PBA suggest that the impact of economic growth on OAN has been adequately addressed through the SHMA (2012 and 2013 Update).

i) Demographic-led need

4.6 The PBA report concludes on demographic-led need of 17,579 dwellings in South Cambridgeshire, 2011-2031 (879 dwellings per annum). However Barton Willmore have a number of concerns in respect of assuming this level of growth represents demographic-led need.

Population Growth

- 4.7 The first concerns the assumptions underpinning the PBA demographic-led figure. As set out in section 3 (above), the 2012-based CLG household projections are underpinned by the 2012-based national projections, which are underpinned by a very low assumption of net international migration to the UK (165,000 people per annum). The most recently recorded year (ending June 2015) shows over double this figure (336,000 people per annum). This significant difference suggests that the 2012-based population and household projections are underestimates at national and local level.

Migration

- 4.8 In the context of the potential underestimate of population growth nationally and locally, it is important to note how the 2012-based ONS SNPP are underpinned by average net in-migration to South Cambridgeshire of 1,037 people per annum up to 2031. This falls below the long-term net-migration trend (2004/05 – 2013/14) which shows net in-migration to South Cambridgeshire averaging 1,269 people per annum.
- 4.9 The long-term net-migration trend shows an increase of 22% to the assumed level of net in-migration underpinning the 2012-based CLG household projection and the PBA report's determination of demographic-led OAN being 879 dwellings per annum. A long-term net-migration trend scenario would therefore be likely to show significantly higher demographic-led need for South Cambridgeshire District.
- 4.10 It is important to note how a 10-15 year net-migration trend is recommended by the Planning Advisory Service (PAS) guidance on Objectively Assessed Need, in preference to a 5-year period. The PBA report fails to consider a scenario based on this higher level of net-migration and it is considered that such a scenario should be undertaken to show demographic-led need based on the long-term trend we have identified. The PBA report does refer to net-migration scenarios presented in the Essex Planning Officers Association (EPOA) Phase 7 report (discussed below), however these scenarios are based on an assumption of only 1,077 net in-migrants per annum only.
- 4.11 A further point to clarify is the treatment of ONS' 'Unattributable Population Change' (UPC) element, which affects the population recorded in the 2001-2011 period. UPC is a discrepancy in population statistics that arose between the 2001 and 2011 Censuses. The UPC may be due to miscounted population in one or both Censuses – though this is more likely to be in 2001

than 2011, because in 2011 methods were considerably improved. It may also be due to unrecorded or misrecorded migration between the Censuses.⁹

4.12 In the context of net migration trends, the inclusion of UPC has the effect of either increasing or decreasing the assumed level of net-migration (as UPC may be a positive or a negative figure). Barton Willmore's approach is to exclude UPC from the calculation of net-migration trends. This decision was made following advice from the ONS, and the methodology applied to calculate the latest 2012-based ONS SNPP (which also excluded UPC).

4.13 This stance on UPC is supported by the PBA report for South Cambridgeshire. PBA conclude there is no local evidence to suggest that UPC is misrecorded migration and they therefore recommend its exclusion.¹⁰ The calculation of long-term net-migration we present in this report (1,269 people per annum) excludes UPC and is considered to be supported by PBA's approach.

Household Formation Rates

4.14 As detailed in section 3 there is clear suppression in the household formation rates (HFRs) underpinning the 2012-based household projections in the 25-34 and 35-44 age groups in South Cambridgeshire, when compared with the pre-recessionary 2008-based HFRs. This view has been supported in recent EiP decisions.¹¹

4.15 In fact, as figures 3.1 and 3.2 (in section 3 above) show, the 2012-based HFRs show lower household formation than the interim 2011-based household projections, the latter of which were widely accepted as being underpinned by suppressed household formation rates. This suppression has occurred due to the lack of supply and significant worsening of affordability nationally and locally, and the result has been a significant increase in concealed households – a family living in a multi-family household, in addition to the primary family – in younger age groups particularly. The ONS has recorded a 70% increase in concealed households across England and Wales in only 10 years (2001-2011)¹², with 44% of concealed families in 2011 being couples with no dependent children living in the family, with these couples most likely to be younger couples living with parents.

⁹ Paragraphs 6.26-6.28, page 23-24, Objectively Assessed Need and Housing Targets Technical advice note (Second Edition), Planning Advisory Service (PAS), July 2015

¹⁰ Paragraph 2.45, page 15, Objectively Assessed Housing Need: Further Evidence, PBA, November 2015

¹¹ Paragraph 4.11, page 6, IN015: West Oxfordshire Local Plan Examination, Inspector's Preliminary Findings – Part 1; and paragraph 3.8, page 7, Cornwall Local Plan Strategic Policies - Examination Preliminary Findings Following The Hearings In May 2015

¹² 289,000 concealed families in England and Wales in 2011, ONS, 06 February 2014

- 4.16 In South Cambridgeshire District the increase in total concealed households has been 78% between 2001 and 2011, highlighting the clear impact of worsening affordability on the propensity of younger people to form their own household. This is higher than the England average (70%).
- 4.17 In the context of the NPPF's requirement to plan positively and significantly boost housing supply, to Plan on the basis of a continuation of suppressed household formation is not considered to comply with the NPPF or PPG. The PBA report does not recommend any adjustment to the 2012-based HFRs and as such it is considered the demographic-led OAN it recommends is a very low assumption.
- 4.18 A response is therefore needed to ensure that this suppression is not projected forward over the Plan period. The most robust approach to apply is therefore considered to be a return to pre-recessionary 2008-based HFRs in the 25-34 and 35-44 age groups, gradually over the Plan period, with 2012-based HFRs in all other age groups. This would result in an increase to the starting point estimate of 879 dwellings per annum.

ii) Market Signals

- 4.19 The PBA report also focusses on market signals, and the upward adjustment required to alleviate worsening trends. Market signals should be considered in the context of ID2a-019 and 020 of the PPG on Housing and Economic Development Need Assessments (HEDNA). These paragraphs identify the six market signals that should be considered, and also state how a worsening trend in any of the market signals requires an uplift to planned housing numbers based solely on household projections; as is the case in respect of the demographic-led OAN in South Cambridgeshire set out in PBA's report.
- 4.20 The PBA report provides an analysis of the six market signals, which can be summarised as follows:
- Rate of Development: the PBA report acknowledges how housing delivery in South Cambridgeshire and Cambridge fell significantly below housing targets in every year between 2001/02, and 2013/14.¹³ This results in total under-delivery of 3,686 dwellings over the last 10 years. Barton Willmore presents these figures in section 3 of this report. This is considered by Barton Willmore to show persistent under-delivery of housing in South Cambridgeshire (averaging -368 per annum) over a long-term period, and to accord with the PPG the OAN should be increased accordingly;

¹³ Figure 3.1, page 19, Objectively Assessed Housing Need: Further Evidence, PBA, November 2015

- **Affordability:** The PBA report acknowledges that the affordability ratio in South Cambridgeshire (based on the PPG's requirement to assess lower quartile house prices against lower quartile earnings) is more acute (at 8.8) in 2013 than the averages of the East of England (8.0), Cambridgeshire (8.0), or England (6.5). PBA's analysis is relatively brief however, and the PPG states how rates of change and absolute levels of change should be analysed. This information is not presented by PBA. However Barton Willmore's further analysis shows that between 1997 and 2013 the affordability ratio has increased by 103% in South Cambridgeshire. This compares with a national average of only 81%. It also significantly exceeds the rates of change in East Cambridgeshire (77%) and Huntingdonshire (84%).

Furthermore the absolute level of change in the affordability ratio between 1997 and 2013 is 4.5. This is higher than that of Cambridgeshire (4.0), the East of England (4.1), East Cambridgeshire (3.5), Fenland (3.2), and Huntingdonshire (3.1). Nationally the change is only 2.9.

This should be considered in the context of the Eastleigh Local Plan Examination Inspector's Report, which concluded how an increase of 10% to demographic-led need should be applied based on an increase of only 97% in the affordability ratio. This 10% increase was based on a view that the market pressure was only 'modest' in Eastleigh.

In the case of South Cambridgeshire there is considered to be considerable evidence to support the notion that market pressure is more than simply 'modest';

- **House Prices:** The PBA report identifies how the house prices in South Cambridgeshire District are significantly higher than the national benchmark, and Table 3.1 of the PBA report provides a comparison of median house prices, which highlights the relatively higher house prices in South Cambridgeshire compared with other local authorities, the region, and nationally.

Furthermore additional analysis by Barton Willmore shows how in absolute levels of change, house prices have risen by £155,000 between 1997 and 2012. This compares with the HMA average (£135,000), the East of England (£132,000) and the national average (£123,500).

- **Rents:** The PBA report provides a brief analysis of the change in market rents between September 2011 and June 2014. The analysis shows how market rents have risen significantly in South Cambridgeshire when compared with the County, the Region, and nationally.

- Further analysis by Barton Willmore emphasises this point in terms of affordability, showing how residents in South Cambridgeshire District classified as earning in the lower quartile would need to spend 38% of their earnings to afford a lower quartile rental property. This compares with Cambridge City (37%), East Cambridgeshire (36%), Huntingdonshire (32%), Fenland (31%), the HMA (34%), and the national average (35%).

4.21 In the context of the above it is considered that there are several indicators to highlight acute market pressure in South Cambridgeshire when compared with neighbouring authorities, the HMA average, regionally, and nationally.

4.22 In summarising, the PBA report identifies how an uplift is required to help alleviate worsening market signals. However PBA also identify how the PPG does not recommend the level of such an adjustment.

4.23 Local Plan examination decisions provide guidance on this, and as referred to above the Eastleigh Local Plan decision (February 2015) recommended a 10% uplift to account for 'modest' market pressure. As we have identified above, the affordability ratio in South Cambridgeshire has increased by a greater percentage than was the case in Eastleigh, alongside a worsening of other market signals to a greater extent than neighbouring authorities and the national average. It is considered that the evidence presented by PBA and by Barton Willmore in this study shows market pressure that is more than just modest.

4.24 The second Local Plan decision referred to by PBA is the Uttlesford Local Plan. The PBA report refers to the recommendation of 10% by the Inspector, but PBA appear to consider the pressure in Uttlesford as 'modest'. The Inspector does not refer to the pressure as modest, and in fact identifies how Uttlesford was within the top 10% least affordable local authorities in England.

4.25 The final decision referred to is that of Canterbury, in which the Inspector applied a 30% uplift to take account of market signals, economic factors, a return to higher rates of household formation and affordable housing needs. Such an increase in South Cambridgeshire would create an uplift to 22,860 dwellings, 2011-2031 (1,143 dpa).

4.26 The PBA report identifies how the Canterbury Inspector focussed on three main signals. The first was median house prices, which was 12% higher than the national average in Canterbury. In comparison, South Cambridgeshire's median house price (£269,995) presented by PBA is 24% higher than the national average.

- 4.27 The second market signal referred to in Canterbury was house price growth, which had grown 20 percentage points above the national average. Although this is not the case in South Cambridgeshire in terms of percentage points, absolute house prices have grown by £155,000 since 1997. This is 25% higher than the national average.
- 4.28 The third point noted in Canterbury was the affordability ratio being consistently higher than the national average, and being 9.0 against the national average of 6.5 at the time of the Canterbury examination. This has also been the case in South Cambridgeshire, with the ratio peaking at 9.3 in 2008 before falling to 7.5 in 2009. However since 2009 there has been significant worsening of the ratio year on year, to 8.8 in 2012.

iii) Summary

- 4.29 PBA's conclusion is to uplift the demographic-led level of need (17,579 dwellings, 2011-2031) by 10% to account for market signals pressure, resulting in OAN of 19,337 dwellings, 2011-2031. This is rounded to 19,500 dwellings, 2011-2031, in the Council's proposed modifications.
- 4.30 However the evidence we have set out above in respect of household formation suppression and worsening market signals that are similar to the Canterbury example justify an increase in excess of the 10% applied by PBA.

C) ESSEX PLANNING OFFICERS ASSOCIATION (EPOA) STAGE 7 REPORT (MAY 2015)

- 4.31 It is considered appropriate to include the most recent demographic forecasts by the EPOA. Their 'stage 7' report provides up-to-date assessments of overall housing need as of May 2015, based on a range of demographic and economic-led scenarios.
- 4.32 For each scenario, the EPOA report considers sensitivity testing for household formation rates, based on a) the latest 2012-based rates, b) interim 2011-based rates and c) the 2008-based household formation rates. The results based on the 2012-based CLG household formation rates are those presented in the summary for each local authority area.

4.33 The results for South Cambridgeshire District are set out below:

Table 4.1: EPOA dwelling growth scenarios, May 2015

Scenario	Change 2013 - 2037				Average per year		
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings	Jobs
Jobs	51,659	34.1%	25,009	40.7%	1,532	1,073	1,046
Employed People	49,536	32.7%	24,182	39.4%	1,456	1,037	1,000
PG-10Yr-Fixed	41,829	27.6%	18,305	29.8%	1,077	785	786
SNPP-2012-LONDON	37,061	24.5%	19,011	30.9%	983	815	729
SNPP-2012	36,044	23.5%	19,217	30.9%	941	824	710
PG-10Yr-X	35,278	23.3%	17,889	29.1%	842	767	673
PG-5Yr-Fixed	35,140	23.2%	15,475	25.2%	832	664	642
PG-5Yr-X	33,842	22.3%	17,053	27.8%	790	731	643
PG-10Yr	33,349	22.0%	16,952	27.6%	767	727	625
PG-5Yr	32,033	21.2%	16,339	26.6%	712	701	605
Natural Change	9,812	6.5%	8,796	14.3%	0	377	123

Source: EPOA Stage 7 report, May 2015

- 4.34 As Table 4.1 shows, demographic-led need would fall significantly short of meeting the level of job growth (1,128 jobs per annum) set out in Table 10 of the EPOA report, a level of job growth that is sourced from the latest 2014 East of England Forecasting Model (EEFM).
- 4.35 The highest level of job growth created by the demographic-led scenarios would be 786 jobs per annum, which falls short of the aforementioned EEFM by a considerable margin, and also fails to meet the job growth referred to in the Council's Proposed Modifications (1,100 jobs per annum, 2011-2031).
- 4.36 As Table 4.1 shows, the jobs led scenario would require growth of 1,073 dwellings per annum, which would equate to 21,460 dwellings, 2011-2031. However this is based on net-commuting reducing from its 2011 Census level (1.06) to a zero net-commute in 2031 (1.00 ratio). Barton Willmore disagree with this approach, as the commuting ratio in 2011 should remain constant to ensure unsustainable levels of commuting are not exacerbated. This is an approach supported by PBA's own Planning Advisory Service guidance on OAN. Maintaining the ratio at 1.06 would have resulted in a higher figure than that set out above.
- 4.37 Furthermore as we have identified in this section and in section 3 of this study, there is clear suppression in the 2012-based household formation rates in the 25-34 and 35-44 age groups. The EPOA report does not provide a scenario for improving this issue, and such an adjustment would also increase the jobs-led figure set out above.

- 4.38 Notwithstanding this there is a sensitivity scenario which applies the 2008-based household formation rates. This shows how the application of these more positive rates of household formation would increase the jobs-led scenario to 1,125 dwellings per annum, or 22,500 dwellings over 20 years.
- 4.39 In summary, the EPOA paper shows how the Council's proposed modification to 975 dwellings per annum would fail to meet jobs-led growth. Furthermore, the EPOA report provides objective assessment based on demographic and economic led factors only, and does not consider market signals and affordable housing need. These should also be considered as part of a full objective assessment of overall housing need, to comply with the PPG.

D) SUMMARY

- 4.40 This section has provided a summary and critique of the evidence base used by the Council in reaching their revised housing target (19,500 dwellings, 2011-2031). The main headlines of our critique are as follows:
- It is agreed with PBA that the 'starting point estimate' of full OAN for South Cambridgeshire is 17,579 dwellings, 2011-2031 (879 dpa). However this is the starting point estimate only. Adjustments to account for more recent demographic data, to accommodate economic growth, to alleviate market signals, and to deliver affordable housing must be considered to provide full OAN;
 - It is not agreed that the uplift of 10% applied by PBA (to 19,337 dwellings 2011-2031) goes far enough in meeting full OAN, for the reasons set out above, summarised as follows:
 - A response to the suppression in household formation rates of 25-34 and 35-44 year olds would increase the starting point estimate. This has not been undertaken by PBA who apply the 2012-based household formation rates as published. PBA's approach does not comply with the NPPF requirement for plans to be positively prepared;
 - The level of net in-migration underpinning the starting point estimate is lower than the long-term net-migration trend. A sensitivity scenario based on the long-term trend should be provided, and would have the potential to increase the demographic starting point significantly above the starting point estimate;

- There is significant justification for applying an adjustment for market signals alone in excess of 10%, due to the market signals pressure in South Cambridgeshire being more than 'modest';
- The PBA report refers to the Canterbury decision, in which an adjustment of 30% was applied to the starting point estimate, to account for market signals, economic factors, a return to higher rates of household formation and affordable housing needs;
- The Essex Planning Officers Association report provides an economic-led scenario which shows a requirement for 1,073 dwellings per annum. This represents an increase of 22% from the starting point estimate. It is considered that this should be the minimum level of growth considered to provide full OAN. Adjustment for suppressed household formation rates would increase this further.

5.0 SUMMARY AND CONCLUSIONS

5.1 In conclusion the key housing figures for South Cambridgeshire District are as follows:

Table 5.1: Key Housing Figures: South Cambridgeshire District Council, 2011-2031

Source	Dwellings per annum
Starting point estimate (2012-based CLG projections)	879
PBA report OAN (market signals uplift of 10%)	967
SCDC Proposed Modifications Plan	975
Essex Planning Officers Association – economic-led scenario	1,073* – 1,125**

*2012-based household formation rates;

**2008-based household formation rates.

5.2 We would make the following headline comments in respect of the revised housing target for South Cambridgeshire District Council (SCDC), and the evidence base it is underpinned by.

- It is agreed with PBA that the 'starting point estimate' of full OAN for South Cambridgeshire is 17,579 dwellings, 2011-2031 (879 dpa);
- However it is not agreed that the uplift of 10% applied by PBA (to 19,337 dwellings 2011-2031) goes far enough in meeting full OAN for South Cambridgeshire;
- A response to the suppression in household formation rates of 25-34 and 35-44 year olds would increase the starting point estimate;
- Demographic-led need based on the long-term net-migration trend (2004-2014) would result in an increase to the starting point estimate. Such a scenario has not been provided by the Council;
- There is significant justification for applying an adjustment for market signals alone in excess of 10%, due to the market signals pressure in South Cambridgeshire being considered as more than 'modest';
- The Essex Planning Officers Association report provides an economic-led scenario which shows a requirement for between 1,073 and 1,125 dwellings per annum based on 2012-based and 2008-based household formation rates. This represents an increase of between 22% and 28% from the starting point estimate. It is considered that this range should be the minimum level of growth considered to provide full OAN for South

Cambridgeshire, in the absence of scenarios to test the long-term net-migration trend, economic-led OAN based on a constant commuting ratio and up-to-date employment forecasts, and recovery in household formation in the 25-34 and 35-44 age groups. Such scenarios would have the potential to show an increase in OAN.

- 5.3 In summary, from the publicly available evidence it is considered that OAN is a minimum of 1,073 – 1,125 dpa in South Cambridgeshire. However a figure towards the upper end of the range should be considered, being based on a recovery in household formation suppression identified in this report. This range may also increase based on up-to-date assumptions of economic growth.

APPENDIX 2

**'WE ARE ONLY BUILDING HALF THE HOMES WE NEED – AND YOUNGER COUPLES
ARE SUFFERING MOST', TOWN AND COUNTRY PLANNING ASSOCIATION, 04
NOVEMBER 2015**

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We are only building half the homes we need - and younger couples are suffering most

4 November 2015

- The latest household projections suggest that we need over 220,000 additional homes in England each year until 2031 if the projected growth in households is to be accommodated.
- Currently we are building only 54% of that number - putting pressure on prices and rents.
- The housing crisis is worse in London and the wider south east where 55% of the homes required need to be located.
- Even if the homes required are actually built the latest government household projections suggest that couples aged between 25 and 34 will be less able to live in their own home in 2031 than their counterparts in 2011.

New figures released today show that young people across the country are struggling more than ever to live independently because of the cost of housing.

How Many Homes, a new research project commissioned by the Town and Country Planning Association, found that the housing requirement to meet projected household formation until 2031 is actually lower than previously anticipated - but this is because younger people are already finding they cannot afford to form independent households.

Housing shortages and the resultant high prices and rents mean that young people are living with parents or in house shares for longer, rather than forming a household of their own. Rising student debt levels and potential future welfare reform are likely to make their position even more difficult.

Kate Henderson, Chief Executive of the Town and Country Planning Association said:

"This research shows that, while it looks as if the projected number of needed homes has dropped, this is because many people now can't afford their own home – either to rent or buy - and are living with parents or other people longer than they would like to.

"The government needs to see this as a wakeup call. It has already fallen behind on their targets for house building, and this is now having a devastating effect on young people. More needs to be done to build the necessary number of high quality, affordable homes for people who need them."

Starting in 2011, a minimum of 220,000 homes are needed each year to 2031 if housebuilding is to keep up with projected household growth – and even this is not enough to enable couples aged between 25 and 34 to have the same chance of living in their own home as their counterparts in 2011.

Of the new homes needed, a staggering 55% are needed in London and the surrounding area. In contrast, in the north east, the number of new households is expected to only rise by 11% over 20 years.

The research, based on statistics from the Department of Communities and Local Government and Office of National Statistics figures, was conducted by Neil McDonald, (previously Chief Executive of the National Housing and Planning Advice Unit) and Professor Christine Whitehead (LSE) was launched in Parliament by Lord Best today.

Christine Whitehead, co-author of this research and Emeritus Professor at the LSE said:

"One of the biggest concerns is that couples aged between 25 and 34 – at the time when family formation is at its highest - are expected to be less well housed in 2031 than their counterparts in 2011. And if house building cannot be increased at least to the projected levels other household groups will find themselves in the same boat."

The research also shows that the government is already falling short of its targets to build new homes. Only 54% of the homes required have been built since 2011. To catch up by 2020 with the number of homes suggested by the projections we need to build over 310,000 homes a year over the next 5 years.

This research was funded by the Lady Margaret Patterson Osborn Trust, and Places for People.

David Cowans, Chief Executive of Places for People said:

"The government may have an ambition to build more homes but this research shows that, to provide the homes where they are needed, much more still needs to be done. Housing is part of the essential infrastructure that this country needs to prosper and on the current delivery rates, this pressing need will not be met.

"Government needs to work with the public and private sectors to arrive at bold and radical solutions to ensure that, together, we can

get on with housing our nation.”

APPENDIX 3

ARUN LOCAL PLAN: INSPECTOR'S OAN DECISION, FEBRUARY 2016

Karl Roberts

Director of Regeneration

Arun DC

2 February 2016

Dear Mr Roberts

Arun Local Plan examination

This letter presents the Inspectors' conclusions on OAN following the hearing on 14 January 2016 (see part 1). Part 2 makes some observations on the issue of unmet need elsewhere in the HMA. Part 3 deals with the next steps and includes notice of formal suspension of the examination as discussed in the letter of 16 September 2015 (IDED14), pending completion of the Council's agreed work programme set out in the Council's letter of 10 September 2015 (ADCED 07&08).

1 Objectively Assessed Housing Need (OAN)

Introduction

1.1 Set within a context in which local authorities 'should' seek to 'boost significantly the supply of housing', the National Planning Policy Framework (NPPF) (at para 47) requires Local Plans to meet 'the full, objectively assessed needs for market and affordable housing in the Housing Market Area (HMA), as far as is consistent with the policies set out in this Framework....'.

1.2 Following a series of reports by GL Hearn & Partners on the housing needs of the Sussex Coast Housing Market Area and its constituent authorities, the Council (ADC) decided that ALP should be based upon an objectively assessed need (OAN) for housing in Arun of 580pa. However, prior to submission of ALP, ADC had already conceded at a planning appeal that it could not offer evidence to rebut the appellant's assessment in that case that the OAN was much higher (786pa). Hearn was therefore commissioned to undertake a new study, issued in March 2015; this estimates the OAN at 758pa.

1.3 In accordance with the outcome of the Procedural Meeting on 16 July 2015 the revised OAN was advertised for public comment in September-November 2015 and subsequently discussed at the hearing on 14 January 2016.

National Planning Practice Guidance (NPPG)

1.4 NPPG (2a-014) points out that establishing future need for housing is not an exact science; no single approach can provide a definitive answer. DCLG household projections for individual Districts are to provide the starting point. Adjustments may be made to reflect local demographic factors which have not been captured in past trends especially where these may have been historically

suppressed (2a-015). Employment trends, market signals and matters related to affordable housing are also to be considered. Potential therefore exists for many departures from the demographic inputs underlying the starting point of the national projections and these may then be modified by a range of judgements based upon these other factors. The effect of the judgements made about these different matters is amply demonstrated by the resulting wide spread of the suggested totals for OAN put forward in the representations, ranging between extremes of 365pa and 982pa. The former extrapolates population change over a 30 year period and household size over 20 years, against a trend-based employment background. The latter uses the DCLG demographically derived projection updated by a number of judgements for economic factors and market signals.

Demographic factors

1.5 The basic starting point of the new Hearn report is the most recent DCLG household projection for Arun, reflecting the approach in NPPG. Alternative projection scenarios based upon simple extrapolation of past trends, especially those reaching farther back into the past, depart too far from the Government projection model and can therefore be given very limited weight.

1.6 Hearn adjusts the DCLG projection for Arun by updating it to take account of the 2013 Mid-Year Population Estimates (MYE) and applying a vacancy rate of 5.6% derived from the 2011 Census. This comprises vacancies arising both from the 'normal' turnover of stock (2.5%) and from second home ownership (3.1%). This is the standard form of approach to the issue of vacancy. Although second home ownership is not a housing 'need', such dwellings are not available to meet the needs of Arun residents. Given the District's coastal location and consequent attraction to a certain level of second home ownership (and since ADC cannot prevent such purchases) it is reasonable to assess the overall level of need for new homes by assuming a continuing proportion of vacancy in the overall stock at the level of the last Census.

1.7 On this basis Hearn takes the 'starting point' of need to be 821pa. However, arguments have been put both that one year's increase of population does not provide a reliable basis for projection, and (on the other hand) that the 2014 MYE issued after the Hearn report show further population increases which should be taken into account. This point is returned to later.

1.8 Turning to other demographic factors, Hearn projects that the age structure of Arun's population will show increases in 2011-31 mainly among the over 60s and under 15s with a small decline in those aged 30-59. The age group 15-29 has shown substantial increase in 2001-13 but is expected to grow at a slower rate from 2011-31.

1.9 Migration presents the knottiest element in the demographic element of OAN in Arun. Against a period (2001/2-2012/13) in which recorded migration

has fluctuated considerably (Hearn Fig 8), the report places 'more weight' on the shorter 5 yr trend (1661pa) than the 12 yr trend (1912pa) despite recognising that the former included the recession, as well as some of the lowest recorded years of migration in the past 12.

1.10 In addition, there is the thorny subject of 'unattributable population change' (UPC). The Office for National Statistics (ONS) ignores UPC in national projections because it is unclear whether or to what extent it may relate to poor population recording in the Census(es) or the misrecording of migration, or both. A technical advice note by the Planning Advisory Service (PAS) records that aggregate UPC is positive by some 103,700 persons on a national basis and claims support from a recent ONS report that the main likely cause is misrecording of migration, probably international migration especially from the EU. PAS points to the difference which UPC can make to projected housing need, referring particularly to the context of large urban areas where projected need can be influenced in a negative direction. The advice note suggests that alternative scenarios may be tested, taking account of UPC and a view taken accordingly.

1.11 In Arun's case UPC between the 2001-11 censuses is stated as some 4051 persons. Its exclusion or inclusion thus makes a significant difference to the demographically based element of OAN. Comparing the Census records of dwellings in 2001 and 2011 Hearn concludes that UPC in Arun is 'more likely' to reflect issues with recording of migration and suggests that adjusting the migration rate by excluding 50% of UPC would be reasonable. However, ONS considers that migration errors would have had a bigger impact in the early 2000s because of improved methods of investigating this factor over time. In at least two cases (Eastleigh and Aylesbury Vale) Inspectors have not supported the concept of adjusting migration in respect of UPC.

1.12 A number of factors suggest a need for caution in the acceptance of the Hearn approach to migration issues in Arun. Firstly, ONS information postdating the Hearn report is that international migration to UK has been underestimated to a statistically significant extent and ONS population projections in 2014 indicate faster growth of population than the 2012 projections. Secondly, while the effects of these factors on Arun are unknown, it is clear that population growth in the District has already exceeded the 2012-Based SNPP judged by the 2013 and 2014 MYEs, including migration. Thirdly, work underpinning the London Plan concludes that net population outflows will take place from London into the wider South East of which Arun is part.

Employment issues

1.13 Forecast employment change in Arun has been materially reduced since the date of the Hearn report. Experian now forecasts that growth will be some 333 jobs pa (2011-31), ie 33% less than in its previous forecast, as used in the report. Decline in jobs in manufacturing and distribution is forecast to be almost

offset by some growth in office employment. Otherwise, the net growth in jobs would arise from non-B class employment areas. This includes a range of broadly service-related jobs, many demographically driven to a greater or lesser extent. The above (reduced) forecast still compares favourably with the long term trend in Arun of employment growth of about 140pa over the period 1997-2012 and will require contributions from new sites such as Enterprise Bognor Regis if it is to be achieved.

1.14 Hearn calculates that for the resident workforce to increase in line with the latest Experian forecast, homes would need to increase at 779pa at the current ratio of net out-commuting or 681pa if the in/out commuting ratio could be brought into balance. ALP aspires to reduce out-commuting and it would be beneficial if (through proposals in the plan and all other available means) the District could increase its attractiveness to employers and boost local job opportunities for residents. However, it seems less clear that it is practicable or desirable to attempt to influence the commuting ratio by restricting housing supply within an individual District in an area like the Sussex Coast where a relatively large number of often quite small authorities have complex social and economic interrelationships and interdependencies with each other (as well as with areas like Crawley/Gatwick and Greater London). An effect of such restriction could be to emphasise the potential for locals to be out-competed by migrants from elsewhere.

1.15 Economic and employment factors therefore do not point to any demonstrable need for uplift of the demographically based elements of the OAN. If anything they could be argued to exert some downward pressure upon the demographic elements of OAN.

Market signals

1.16 NPPG (2a-019) indicates that demographically-derived need should be adjusted to reflect appropriate market signals of various identified kinds, stating (2a-020) that a worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to those based solely on household projections.

1.17 The Hearn analysis of market signals indicates that median house prices in Arun increased by a marginally greater percentage than in the HMA or the South East generally over the period 1998-2007, but started from a generally lower base. More recently (2008-13) the median price in Arun and the comparator areas has been relatively flat (and has declined in real terms). For 3 out of 4 house types Arun has the lowest prices in Coastal West Sussex and the second-lowest for the 4th.

1.18 Lower quartile house prices in Arun (2013) were 9.6 times lower than lower quartile earnings, this being about average for Coastal West Sussex and slightly higher than for West Sussex County (8.9), albeit much higher than the

national average (6.5). Generally, the lower quartile affordability ratio has been stable over the past decade, indicating no worsening. However, affordability of market housing in Arun is strongly interlinked with residents' earnings levels. Lower quartile earnings in Arun are the lowest in Coastal West Sussex (just over £17,000) and compare with materially higher levels in West Sussex of £19,600 and England £19,300. Median earnings are also lower than these comparators. At the lower end of the market terraced houses and flats are notably less expensive than the average across the HMA.

1.19 The most recent data shows that Arun's median rental level (£695pcm) is lower than that for Coastal West Sussex (£775pcm) and the South East (760pcm), albeit higher than that for England as a whole (£595pcm). Rental levels have risen since 2011 at the same rate as in West Sussex but remain lower than the comparator levels other than in the South East as a whole. Compared with the Consumer Price Index Arun rents have risen by very little.

1.20 In 2001-2011 the percentage of overcrowded households in Arun increased somewhat, but at less than regional/national levels and overcrowding remains lower overall than in those areas. The proportion of Houses in Multiple Occupation increased slightly more than in other parts of the HMA but in total is less than in the South East or England.

1.21 Overall Hearn concludes that 'the analysis of market signals points to some *modest* affordability pressures in the District'. An adjustment is made though a 'sensitivity analysis' which adjusts household formation rates for the 25-34 age group to assist their return to the pre-recession levels of 2001 over the period to 2031. It is a relatively common element of OAN assessments to make this type of adjustment in order to avoid embedding into the future the recessionary trend which appeared to reduce household formation rates for this age group in the period 2001-11. It may be debatable whether or not this adjustment is logically more of a demographic factor rather than market signal-related. Nonetheless, it is appropriate to make it.

1.22 As shown by the information presented by other parties, evidence on market signals can vary, dependent upon the years and/or other areas selected for comparison. It has been suggested that similarly 'modest' affordability issues in Eastleigh justified a 10% uplift whereas the above uplift is less than 5% of Hearn's estimate of demographic-led needs.

1.23 On the whole, the evidence on market signals does not convincingly point to a need for significant further numerical adjustments. It may be that any market weaknesses in Arun are better addressed (in its circumstances) by policies identifying the kinds of housing most affordable to Arun residents below the median earnings levels and targeting appropriate proportions of new homes as much as possible at meeting those needs, possibly by building upon the basis of the strategic mix recommended in Hearn table 33, rather than making any further uplift.

Affordable Housing

1.24 Reflecting the general approach in NPPG, and using reasonably based data, Hearn assesses the net need for affordable housing at 480pa (table 21), taking account of the needs arising from newly forming and existing households minus expected supply from planned new-build and relets of the existing stock. This is the need which would arise if all households unable to meet their needs without financial support were to be provided with an affordable home.

1.25 Even under the Hearn approach of discounting 50% of UPC, the report concludes that the need for affordable housing nominally represents almost 60% of the need derived from the demographic projection. This is far greater than can be close to deliverable though market-housing led development or other current Arun initiatives to increase affordable home-building. NPPG 2a-029 advises that in such circumstances 'an increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of homes.'

1.26 Allowing for the 'existing household' element of those identified above (who, if moving into an affordable home, would vacate another probably within the private rented sector), Hearn estimates the net need for affordable housing at about 220pa, which is close to the quantum sought through the ALP policies. This may be pragmatically the case; however, there has been much recent debate about such reliance upon the private rented sector, since it is not part of the NPPF definition of affordable housing.

1.27 The report's conclusion is that there is no 'technical' need to increase OAN on the basis of affordable need but that there are choices to make concerning how such needs are to be met. The affordable housing evidence is said (4.41) to 'provide some justification for considering higher housing provision' in order to enhance its delivery' and that conclusion is carried through (7.21) as part of the uplift described above under 'market signals' concerning the household formation rates of younger households.

Overall conclusion on OAN

1.28 In our judgement a rounded figure of 820pa represents a reasonably broadly-based starting figure for the OAN, consistent with Hearn's demographic starting point. For reasons previously stated (1.11-1.12 above) we do not see a case to partly-discount UPC. The Hearn report's upward adjustment of 26-28dpa (rounded to 25pa) should be added to the 820pa to assist an increase in household formation for the key 25-34 age group, mainly as a demographic adjustment. This would result in a total OAN of 845pa. Overall it is not seen as necessary to make further adjustments to the OAN, since employment-related issues (modestly negative) are seen as generally balanced out by market signals and affordable housing pressures (both modestly positive).

2 Unmet need from elsewhere in the Housing Market Area

2.1 Although the local plans within the HMA are at various stages of evolution it is apparent that the needs of the area as a whole are not being met through the emerging plans being prepared by the constituent authorities.

2.2 ALP already recognises (paras 12.1.12 & 12.1.66) that it may have a role to play in meeting some of these needs, as was previously identified in Hearn's Housing Study (Duty to Co-operate) report of May 2013 albeit in a context in which the OAN of Arun itself was a significantly smaller number. ALP refers particularly to Worthing and sees the issue being tackled in a future review. However, the suspension may offer an opportunity to explore any potential scope for the content of ALP to achieve greater alignment with the requirements of relevant neighbours in order to address the issue more urgently. This objective should be pursued as far as possible in the forthcoming work.

2.3 To that end it would be useful to the progress and clear outcome of that work if sustainability appraisal of the forthcoming modifications to ALP were to test higher levels of provision against the sustainability principles of the NPPF, not only in a high-level sense but also with regard to potential area/site-specific solutions for meeting some of this need.

3 Next steps

3.1 The examination of ALP is today formally suspended, pending completion by ADC of the programme of work summarised in Appendix A of its letter to Mr Foster dated 10 September 2015 (ADCED 07&08) and agreed in principle by him on 16 September 2015 (IDED14). The outline programme indicates that (A) proposed Main Modifications to ALP will be put to public consultation in late 2016/early 2017 and (B) those modifications, along with the representations made about them, will be sent to the Inspector (then Mr Bore) in March 2017. Subsequently arrangements will be made through the Programme Officer for the resumption of hearings as soon as may be practicable.

3.2 The Council's programme of work will of course need to include consideration of a number of matters covered in Appendix 1 to the Inspector's letter of 30 July 2015 (IDED13), concerning Littlehampton Economic Growth Area, including West Bank (at paras 13-19), Enterprise Bognor Regis (at paras 20-27), the Barnham, Eastergate and Westergate strategic allocation (at paras 28-51) and 'Other Matters' (at para 52).

3.3 It may also be helpful at this stage to reiterate some points from IDED14 concerning sustainability appraisal. The paragraphs quoted below also draw upon the Inspector's conclusions in IDED13 (at paras 6-12):

I recognise that the proposed timetable is only in outline, but note that it makes no specific reference to the necessary new work on sustainability appraisal of the type referred to in appendix 1 to my letter of 28 July (paras 6-12) (IDED13). Such work will

clearly need to be included under the umbrella heading 'further work/updated and additional studies'.

I also consider it important to reiterate the point in paras 11-12 & 22 of my letter of 28 July (and para 12 of the appendix) – that the Council needs to be able to demonstrate that the issue of identifying 'the most appropriate strategy, when considered against the reasonable alternatives' (NPPF para 182) has been approached in an open-minded way. Reasonable alternatives for meeting the requirement which emerges from the forthcoming consultation need to be identified without risk of endangering the process by (a) any appearance of pre-determination or (b) over-reliance on the contents of the SA accompanying the submitted plan.'

3.4 Mr Bore will conduct the resumed examination. He will liaise as necessary with Caroline Pattenden, the Programme Officer, about ADC's progress with its timetable of work and any procedural matters as may arise before the proposed modifications are submitted. In the meantime participants should not submit representations or correspondence about the matters which ADC will now be pursuing since Mr Bore's active involvement in the content of ALP will not commence until the proposed modifications and the representations concerning them have been submitted and the examination has been reconvened.

Roy Foster, Inspector

Jonathan Bore, Inspector

Roy Foster

Jonathan Bore

APPENDIX 4

**PAGES 06-12 CORNWALL LOCAL PLAN STRATEGIC POLICIES - EXAMINATION
PRELIMINARY FINDINGS FOLLOWING THE HEARINGS IN MAY 2015, 05 JUNE
2015**

3. OBJECTIVELY ASSESSED NEED (OAN) AND THE HOUSING REQUIREMENT

Background

3.1 The plan (policy 2, part 4) provides for 47,500 homes at an average annual rate of 2,300. This figure is consistent with the dwelling requirement identified in the *Strategic Housing Needs Assessment (SHMNA)* July 2013 (C.9) derived from the rebased Sub National Populations Projection (SNPP) of 2010 (Table 6.24, C.9) which incorporates a 3% vacancy rate to convert future households to dwellings required.

3.2 The demographic projection is only a starting point and national policy and guidance requires consideration of a number of other matters, including whether any uplift is required in response to market signals or to meet in full affordable housing needs and to ensure alignment between the economic strategy and future workforce availability. In Cornwall there is an additional issue relating to holiday/second homes when converting the demographic projection to a dwelling requirement.

Housing Market Area (HMA)

3.3 Cornwall is sufficiently aligned with a single housing market area for housing needs to be considered on a Cornwall-only basis. I have seen no substantial evidence to justify requiring an alternative approach to the geographic coverage of the SHMNA.

The demographic starting point

3.4 A number of representations indicate that past projections for Cornwall by the Office for National Statistics (ONS) and Department of Communities and Local Government (DCLG) over-estimated future growth compared with what actually happened and that therefore they are not a reliable basis for planning. Since the Census of 2011, ONS has undertaken considerable updating and correcting of the data that is used for population/household projections to ensure that projections are as robust as possible. I have not seen evidence to demonstrate that past projections were so out of step with what occurred in Cornwall compared with elsewhere or that such large variations would occur in the future to justify a departure from national policy/guidance on their use as the demographic starting point.

3.5 On 27 February 2015 the (DCLG) published new household projections based on the 2012 SNPP published last year. These projections post-date the SHMNA. From subsequent analysis undertaken on behalf of the Council, publication of these projections would not, in isolation, have justified a change in the housing requirement in the plan (*Edge Analytics* ID.01.CC.3.3 and ID.01.CC.2.2.). However, as explained by Edge Analytics, the latest projections embed revised data, including the revision by the ONS of the inter-census Mid-

Year Estimates on which the components of past changes used for future projections are calculated. These recent projections are thus derived from more robust data than was available for use in the SHMNA. In addition, to provide the most robust projections appropriate to Cornwall, some adjustment to the ONS/DCLG methodology is justified as highlighted below.

3.6 *Migration.* The demographic model used in the SHMNA and the more recent ONS projection uses migration flows from the previous 5 years only. Given the significance of migration as a component of change for Cornwall and to even-out the likely effect of the recent recession on migration between 2008-2012 a longer period than 5 years would give a more realistic basis for projecting this component. A period of 10-12 years was suggested at the hearing and I consider that this would be reasonable, rather than the 17 year period used in ID.01.CC.3.3. I also consider that the ONS' *Unattributable Population Change* component should be assigned to international migration for the reasons given by Edge Analytics in ID.01.CC3.3. This approach was not disputed at the hearing.

3.7 *Household formation/headship rate (HR).* Tables 5 and Fig 8 in ID.01.CC.3.3 indicate that there is not a substantial difference in the annual household growth rate between projections to 2035 using the 2008-based HR and the 2012-based HR (although the figures would be slightly different if only covering the plan period to 2030). I accept that the 2012 HR used in the new household projections is much more robust than that used in the earlier 2011-based interim projection. There is now no basis to rely on the 2008 HR in full, as done in the SHMNA.

3.8 Nonetheless, the HR 2012 may still embed some recessionary effect. It would be inconsistent with the national policy for growth to project any such effect throughout the plan period. Accordingly, the projections developed as part of this further update should show both the HR 2008 and HR 2012 and the mid-point, blended approach. On the current evidence, I consider that the most robust approach for deriving the housing requirement would be a projection using a blended HR rate. (I am aware that there are various simple and sophisticated methodologies which have been used to blend different HRs to achieve a part return to the earlier trend over the projection period, but I see no need to be prescriptive.)

3.9 In undertaking this further demographic modelling, it would be useful to show alongside the above, the comparable figures derived directly from the SNPP based 2012 projections without the above adjustments (as done in ID.01.CC3.3).

3.10 The updated projections by Edge Analytics are for 2012-2035 which is not the plan period. The annual average requirement will vary depending on the length of the projection period used. The annual requirement for the plan period should be based only on the data that covers this period (to ensure that the

needs arising in that period are met in that period). This approach has the effect of increasing slightly the annual rates from those shown in Table 5 of ID.01.CC3.3.1 (as shown in the Council's Hearing Statement, top of p5). The latter approach should be the basis on which the housing requirement for the plan period is derived. The further work must also include additional information for the annual household growth rate for the period 2010-2012, so that the full plan period is addressed. All such matters should be clearly explained in the further work so that it is straightforward for all parties to follow. I expect that the combination of the above changes will result in a small increase in the demographic starting point from that shown in the SHMNA.

Market signals

3.11 From the range of signals highlighted in the Council's evidence (mainly Briefing Note 14 and SHMNA) and in representations (eg by Barton Willmore rep 576, and Savills rep 783), I consider that no consistent picture emerges. For example, indexed dwelling stock growth in Cornwall between 2002-2011 was greater in Cornwall than for England. Housing delivery was well above that required by the Structure Plan over this period. Although delivery was below that required by the previously emerging Regional Spatial Strategy (RSS) I do not give much weight to that factor given that the RSS was never formally approved and from 2010 it was clear that it was not going to be progressed. Median house prices are above those for England, but there is no worsening trend.

3.12 Between 1997 and 2002 the ratio of lower quartile house prices to lower quartile earning for Cornwall was similar to the South West and above that for England. The trend was slightly worsening over that period. Between 2003 - 2008, the affordability ratio for Cornwall worsened significantly, rising well above the regional figure, which in turn worsened compared with the figure for England. All 3 of these ratios improved during the recession with Cornwall showing the most improvement (between 2008-2009). But Cornwall remains significantly above the regional and national figures. Over the long term, the picture is of a worsening trend and a position significantly worse than the regional and national averages. National guidance is that a worsening trend in any relevant market signal should result in an uplift. But for the reasons given below I do not consider that I should require such an uplift to be made for Cornwall at this time.

3.13 Given that much of Cornwall forms a largely self-contained HMA, any uplift large enough to make a significant difference would have questionable deliverability because it would be out of step with the availability of households to fill the additional dwellings, based on a robust demographic projection (already including significant net migration). Furthermore, there is considerable variation in average house prices across Cornwall (SHMNA Figs 5.3 and 5.4) and

weak viability affecting delivery in some important towns (see below). In this context a generic uplift would not seem a relevant response to the problem.

3.14 One element of the affordability ratio is earnings and earnings are particularly low in Cornwall (see, for example, BN17 p3). It is one of the issues that the Council and Local Economic Partnership (LEP) are seeking to address (see below). It would be counter-productive for the success of that strategy (which I endorse) if population growth and the resulting increase in the workforce was out of step with the strategy and resulted in earnings not improving as planned. I am requiring further work from the Council to explain its jobs/workforce expectations. It will be for the Council to consider whether an uplift to the demographic projection is required in the wider context of aligning housing and (targeted) economic growth.

3.15 At the hearing, the only specific suggestion for an uplift was the modest 10% required by Inspectors in a few other Examinations recently. But for Cornwall I consider that the 7% I am requiring to recognise second homes/holiday homes is a more specific, evidence-based adjustment to the demographic projection to reflect the realities of an important element of the housing market in Cornwall.

Affordable housing need

3.16 The total affordable housing need identified in the SHMNA is 30,912 households (summarised in Table 8 ID.02.CC.1, drawn from SHMNA figs 7.2 and 7.3). To address the backlog element of this need over 5 years and still meet newly arising need would require 2,240 units a year, which is most of the overall annual housing requirement in the plan. At the hearing, there was broad acceptance that the scale of need had been adequately identified.

3.17 The assessment of affordable housing need is separate from the objective assessment of need arising from demographic projections. The existing households in need of affordable housing are not included in the demographic projection. But if such households were able to move from their existing unsuitable private rented accommodation to suitable affordable housing their existing accommodation would become available for others (for whom it may be suitable). So there is no need for this element to be added to the overall OAN. Equally, this element should not be subtracted from the total affordable housing need as suggested by the Council.

3.18 I have found (see below) that expected delivery is likely to be less than the Council's calculation of 22,000 affordable homes over the plan period (Table 9, final form in HD.CC.06). There is thus a substantial gap between delivery and overall need. The backlog and newly arising need has not been met in the first 5 years of the plan. National Guidance states: *An increase in the total housing figures included in the local plan should be considered where it could help deliver*

the required number of affordable homes. (Paragraph: 029 Reference ID: 2a-029-20140306).

3.19 I do not doubt the Council's very strong commitment to the delivery of affordable housing using imaginative models to do so and substantial Council funds. Nonetheless, I cannot see in the evidence any serious, objective *consideration*, as required by national guidance, as to the scope for further narrowing the gap between identified need and expected delivery by some increase in market housing. This is a matter the Council needs to consider afresh in the light of my findings on need and delivery.

3.20 National guidance requires *consideration* of an uplift; it does not automatically require a mechanistic increase in the overall housing requirement to achieve all affordable housing needs based on the proportions required from market sites. The realism of achieving the intended benefit of additional affordable housing from any such uplift is relevant at this stage, otherwise any increase may not achieve its purpose.

3.21 Any uplift on the demographic starting point such as the 7% addition for second/holiday homes that I am requiring (see below) would deliver some additional affordable housing and can be taken into account in judging whether any further uplift is justified. A very substantial uplift would raise the same concerns as I set out above in relation to market signals, but some further uplift should still be carefully considered by the Council. The weight to be given to any such uplift is clearly related to the proportion of affordable housing that would be delivered as a result. Thus additional delivery in zone 1 would be more beneficial than in zone 5. But the appropriateness of such a response would also need to be considered such as the desirability of meeting needs broadly where they arise, given the size and distinct geography of Cornwall. The Council will need to explain its assessment and response to this matter carefully.

Holiday homes/second homes/vacancy rate

3.22 The SHMNA used a 3% vacancy rate to convert the household projection to a dwelling requirement. The Council's Briefing Note 11, p5 comments: *Second homes account for a significant proportion of dwellings in Cornwall and it could be argued that we need to plan for a number of new dwellings to meet this need in addition to that planned to meet future household growth needs.* There is a similar point in Briefing Note 12, *Note of Caution 4*. But no such allowance has been made.

3.23 The National Planning Policy Framework (NPPF) does not identify second/holiday homes as a "need" and therefore such homes should not be counted as part of the objectively assessed need (OAN) required by the NPPF. But the acquisition of future new dwellings as holiday/second homes would remove those dwellings from the stock available for the needs which have been assessed. More generally, if at 2030 the proportion of the total housing stock

occupied as holiday/second homes is similar to now, additional existing homes would have been acquired as holiday/second homes and be unavailable to meet assessed needs, even if newly built homes in some locations are not attractive for such use. Accordingly, in converting the OAN into a housing requirement for the plan, an allowance should be added for second/holiday homes. It is reasonable to assume that the proportion of holiday homes will not decline over the plan period, especially given recent and planned improvements in transport connections serving Cornwall.

3.24 The 2011 Census recorded unoccupied household spaces as 11.2% of the stock, but this figure includes the 3% vacancy rate already used in the SHMNA. So the maximum rate that could be used for holiday/second homes would be 8.2%. Until 2013, the Council offered a discount on homes occupied as second/holiday homes. Such a discount was given on 5.4% of homes. Many, but not necessarily all qualifying households would have applied for such a discount, given that it was only 10%. The allowance for holiday homes should not therefore be less than 5.4%. The remaining unoccupied households recorded by the census may be accounted for, in part at least, by properties used as short term holiday accommodation as part of a business on which business rates are charged.

3.25 On the evidence currently available and adopting a pragmatic approach between the minimum and maximum figures referred to above, I consider that 7% should be added for second/holiday homes when converting the OAN to the housing requirement for the plan, in addition to the vacancy rate.

The needs of particular groups

3.26 As indicated at the hearing, I find that the need for housing for particular groups (for example, in relation to the private rented sector, self-build, older people, and households with specific needs) has not been adequately assessed and further work is required in this regard. Chapter 8 of the SHMNA provides various relevant demographic information, but there no assessment, for example of the future need for specialist accommodation for older people broken down by tenure and type (eg sheltered, enhanced sheltered, extra care, registered care) or the demand for self-build plots (see National Planning Guidance Paragraph: 021 Reference ID: 2a-021-20150320).

Compatibility with the economic strategy

3.27 Many parties highlighted the much higher household projections based on economic projections (SHMNA, Fig 9.2) and the past high rate of job growth in Cornwall. But those projections (from 2010-2012) do not take into account the LEP's Economic Strategy. The high rate of past job growth did not overcome the structural weaknesses in the economy of Cornwall, including low earnings/low Gross Value Added. Accordingly, as explained below, I endorse the LEP Strategy and do not consider that reliance on past trends or the economic projections in

the SHMNA are an appropriate basis for assessing the housing requirement. Following the further work required by the Council in ensuring that the plan is delivering the economic strategy and clarification in relation to job expectations, the Council will need to demonstrate that there would be a suitable alignment between economic development, job and workforce growth and the housing requirement.

4. ECONOMIC NEEDS AND STRATEGY

The economic strategy

4.1 The stated intention of the plan (eg paragraph 2.3) is to support the Council's and the LEP's Economic Strategies (ID.01.CC.1.4 and ID.01.CC.1.5 respectively) which are closely aligned. These strategies seek to address the underlying and long term economic weaknesses in the economy of Cornwall (summarised for example in ID.01.CC.2.3). The poor performance of the Cornish economy means that Cornwall is the only part of the UK which qualifies for EU regional convergence funding. The LEP strategy is to address these deficiencies by a range of interventions which will include substantial public funding eg targeting companies and sectors that will promote high quality jobs growth; improving infrastructure, including transport connections and broadband; improving skills.

4.2 The only representations which seriously dispute the thrust of the economic strategy of the Council and the LEP are those which argue for a radical alternative model to conventional assumptions about the benefit of economic growth. However, economic growth is a key Government aim which is reflected in the NPPF. The plan is sound in seeking to facilitate the mainstream model of economic growth, albeit with the particular focus already highlighted. Other representations consider that the plan does not sufficiently address the needs of particular sectors (eg agriculture and tourism), but overall the LEP's and Council's economic strategy is largely accepted or unchallenged.

4.3 LEPs are the lead body endorsed by the Government for promoting local economic development. The Government is clearly supportive of the LEP's aims and substantial national and EU funds for economic growth are being channelled through the LEP or in joint programmes in which it is a key partner.

4.4 As already noted, a simple continuation of past trends is unlikely to address the problems which exist. I therefore accept that a more targeted approach is required, as expressed in the LEP's strategy. The plan is sound in as much as it intends to support and deliver the land use elements of that strategy.

The shortcomings of the plan

4.5 Policy 2, part 1 seeks to improve conditions for business and investment providing an overall increase in jobs and supporting the provision of better paid full time equivalent opportunities to drive an increase in the Gross Domestic

APPENDIX 5

**WEST OXFORDSHIRE LOCAL PLAN EXAMINATION INSPECTOR'S PRELIMINARY
FINDINGS – PART 1, 15 DECEMBER 2015**

WEST OXFORDSHIRE LOCAL PLAN EXAMINATION

INSPECTOR'S PRELIMINARY FINDINGS – PART 1

The Housing Requirement, the needs of Oxford City and the Duty to Co-operate

1. Introduction

1.1 As previously indicated, following the first week of hearings in November, I am publishing these Preliminary Findings to establish how the Examination should proceed. This note focuses on the crucial matters of the housing requirement, the needs of Oxford and the Duty to Co-operate. It focuses on those matters where I have identified shortcomings and on which I consider further work is required. It does not seek to address all points raised on these matters. Part 2 of my Preliminary Findings address, so far as is necessary at this stage, other matters covered in the first week of hearings.

1.2 I conclude in this Note that the housing requirement in the submitted local plan of 10,500 dwellings is not justified and has not been derived from a process which complies with the requirements of the NPPF. Accordingly, further work is required which, if the Council wishes to proceed, will mean a suspension of the Examination. I will confirm arrangements for any suspension once the Council has considered how it wishes to proceed and how long the further work will take.

1.3 The Secretary of State's letter to the then Chief Executive of the Planning Inspectorate of 21 July 2015 and the Minister of State's Written Statement on Local Plans both indicate that Inspectors should be highlighting significant issues at an early stage to give Councils a full opportunity to respond. This Note has been prepared in that context.

2. Background to the Council's justification of the housing requirement

2.1 The National Planning Policy Framework (NPPF) paragraph 159 requires Councils to prepare a Strategic Housing Market Assessment (SHMA), working with neighbouring authorities where housing market areas (HMA) cross administrative boundaries. The Oxfordshire SHMA (G L Hearn Limited, April 2014, HOU2) was produced on behalf of all the Oxfordshire authorities acting together through the Oxfordshire Spatial Planning and Infrastructure Partnership (SPIP), the predecessor to the Oxfordshire Growth Board (OGB). West Oxfordshire Council was the lead authority for this task. The SHMA identifies a HMA for the whole of Oxfordshire, including West Oxfordshire (West Oxon). There is no evidence of substance to come to a different view on the extent of the HMA.

2.2 The Council accepts (eg WOLP29, 4.3 and the Statements of Common Ground, SCG, with the other Councils) that the Oxfordshire SHMA provides the most up-to-date, comprehensive, objective assessment of housing need, including affordable housing needs available for the Oxfordshire HMA and that it is an appropriate basis on which to progress cross-boundary work to identify and accommodate Oxford City's unmet housing need.

2.3 The SHMA identified a range of housing needs for each of the Oxfordshire authorities derived from demographic evidence, economic projections and affordable housing need. Its recommendations are based on the midpoint of the identified range (eg HOU2, Table 90). For West Oxon, the SHMA's recommendation was 660 dwellings

per annum (dpa) which would total 13,200 dwellings over the whole plan period. The local plan's proposed 10,500 dwellings (525 dpa) thus falls significantly short of the SHMA's recommendation. All the other authorities in Oxfordshire have accepted the SHMA's mid-point recommendation as the basis for the progression of their local plans; Cherwell's local plan has already been adopted on this basis. Equally importantly, the SHMA is accepted by all the authorities as the basis for identifying the needs of Oxford City, a substantial portion of which cannot be met within the City's boundaries.

2.4 The starting point for the Council's decision not to follow the SHMA is in 9.17 of the SHMA: *West Oxfordshire stands out as having delivered significantly higher housing provision relative to its South East Plan targets over the 2006-11 period. It delivered almost 1,400 additional homes over and above its housing target. This level of growth was a result of several urban extensions coming forward at the same time, resulting in high levels of in-migration which have influenced household projections moving forward. As such, the District Council may wish to further consider this in light of the Planning Practice Guidance which highlights the need to consider previous over-supply as well as under-supply. No adjustment to figures has been made at the SHMA, but there is potentially a good basis for doing so with reference to previous household projections and needs' assessments alongside the South East Plan targets.*

2.5 It is unfortunate that this issue was not dealt with expeditiously at the time, either as an integral part of the final production of the SHMA, or as an immediately following Supplement, which could have made any necessary technical adjustments to the demographic starting point whilst remaining consistent with all the other assumptions in the SHMA. Any such Supplement could then have been put to the other Oxfordshire Authorities for agreement.

2.6 The Council's approach was to commission further work from other consultants. In particular *An Analysis of West Oxfordshire's future housing requirement (2011-2029)* by Dr K Woodhead, June 2014 (HOU3). This is a wide-ranging piece of work. Amongst other matters, it explores the extent to which the higher rates of house building in the mid-2000s influenced migration rates and thus population projections; it makes various methodological criticisms of the SHMA generally; and seeks to develop household projections based on the then recently published ONS 2012 Sub National Population Projections (SNPP) in advance of the household projections from DCLG. The Council also commissioned a *Validation of Objectively Assessed Housing Need* (Cambridge Centre for Housing and Planning Research, CCHPR, January 2015, HOU4).

2.7 The Council's criticisms of the SHMA and the basis for selecting a different figure is summarised in its *Housing Position Statement* July 2015 (HOU1) with a summary at 2.9. This paper included new demographic modelling from a third consultant (Demographer John Hollis) which compared the most recent DCLG Household Projections with projections based on alternative migration rates. In response to my Preliminary Questions and Comments (July 2015, IN 001) the Council published WOLP1, August 2015.

2.8 The 3 consultants' reports produce a variety of projections and/or recommended figures/ranges for a housing requirement. None specifically explain why the plan's figure of 525 dpa is justified. The Council draws selectively on this evidence. WOLP1, paragraph 2.23 highlights the main elements of HOU3 (Woodhead) and HOU4 (CCHPR) on which it still relies. However, the diversity and complexity of the evidence and the lack of a coherent, single evidential narrative (such as found in the SHMA) has made it difficult to weigh all aspects of the Council's evidence in testing the soundness of the

plan's housing requirement. I have therefore focussed on the main elements in contention. In as much as the Council highlighted national guidance which indicates that the most recent Government projections should be the starting point for housing needs assessments, I have given particular attention to the work of Hollis comparing the DCLG 2012 SNPP based household projections with his alternative migration projections (HOU1, Table at p20 and App1 Table 1).

3. Is the *process* by which the Council developed its housing requirement sound?

3.1 The Council indicates that it had consistently expressed concern about aspects of the SHMA at the OGB, which is co-ordinating joint working on housing across Oxfordshire, and at its predecessor, the SPIP (see WOLP1, 3.4-3.13). I have seen no written reports in which these concerns were set out, but I accept that various concerns were raised, at least orally, with varying weight. I also accept that the Council has consistently been concerned that the demographic starting point used in the SHMA is unreasonable because the methodology projects forward a household migration rate derived from a period when there was a spike in house building. But there is nothing to indicate any formal dissent by the Council when the SHMA was approved by all the Councils for publication as just that, a SHMA for Oxfordshire. Indeed, the Council's SsCG with the other Oxfordshire Councils confirm that West Oxon, along with the other Councils, *signed off the consultant's methodology developed to produce the SHMA* (WOLP 28, 29 and 30, paragraph 4.2). Other documents indicate a long-standing shared commitment to take forward the SHMA in local plans (eg the *Oxfordshire Statement of Cooperation*, SD4, App 3, paragraph 5.3 and the *Oxford and Oxfordshire City Deal* p5, SD11).

3.2 There is no evidence that the Council has shared with its OGB partners the need for new evidence from other consultants; the methodologies to be employed in that new evidence; the Council's decision to rely on matters peripheral to the thrust of the SHMA's recommendations (eg the economic baseline; the 40% income threshold for affordable housing); or the Council's criticisms of some of the methodology of the SHMA. Most importantly, the Council has not explored with its HMA partners the potential implications of the Council's approach for the continued legitimacy of the SHMA as evidence to support local plans in the rest of Oxfordshire.

3.3 Accordingly, there has been a clear failure to accord with the NPPF's requirement to work with neighbouring authorities across the HMA. This is a significant concern for Oxford City, as expressed at the hearing and in its SCG with the Council (WOLP 37, paragraph 3.3). Whatever the technical merits of the various points put forward by the Council, I could not endorse them as a sound basis for the Council's housing requirement unless there had been a clear process of joint working with its partner authorities to consider the implications for the continuing validity of the SHMA's recommendations for those authorities.

3.4 Joint working across an HMA is essential to ensure a reasonably consistent approach and to avoid unintended distortions in the market. In addition, the credibility of the SHMA is the foundation on which much of the current planning work for the rest of Oxfordshire is based. That does not mean it should be beyond criticism, but a Council should be particularly mindful of the wider implications of criticisms and of the reasoning supporting any local adjustments.

4. The demographic starting point and the significance of past high rates of housing delivery

4.1 The demographic starting point identified in the SHMA for West Oxon is 541 dpa. The SHMA was prepared when the latest household projections were the interim DCLG 2011 based SNPP. These covered only a 10 year period and are widely recognised as not as robust as the previous or subsequent projections. The SHMA had to make a number of assumptions and adjustments to produce robust projections for the plan period to 2031. It therefore makes sense to check the SHMA's demographic assumptions against DCLG 2014 household projections (based on the 2012 SNPP). This latest projection indicates annual growth of 458 households per annum (hpa) which, with a vacancy rate of 5.17%¹, equates to 483 dpa. However, the Council's now preferred demographic starting point is 423 hpa/446 dpa (Hearing Statement p4). This is the mid-point of the output of the 2 alternative projections prepared by Hollis (HOU1, Table at p20 and App 1 Table 1). One projection is based on average long term migration trends (2004-2014) and the other on short term migration trends (2009-2014).

4.2 National guidance states: *If a Council has robust evidence that past high delivery rates that inform the projections are no longer realistic – for example they relied on a particular set of circumstances that could not be expected to occur again – they can adjust their projections down accordingly.* (Paragraph: 036Reference ID: 3-036-20140306) The Council's view is that there were abnormally high rates of house building which have unfairly influenced projections, particularly as used in the SHMA. The Council explains this spike in building by reference to a number of large allocations coming on stream at a similar time. However, Table 9 in HOU3 indicates that delivery on previously unidentified sites was also making a significant contribution. I do not regard that particular past situation as one which could not be expected to occur again. Indeed, the plan makes several large allocations which the Council expects to be delivering at the same time (see WOLP14, 15, 16, 17, 18 and 19). In the period before the plan is adopted and any necessary allocations are made, development is also likely to occur on a number of previously unidentified sites. So a spike in housing delivery may well occur again. In part at least, this would be the result of the long gap without an up-to-date plan in place. Nevertheless, bearing in mind that ONS population projections are largely based on the past 5 years, it is right to be alert to any unusual factors in the period which feed into a particular projection. I explore this further below.

4.3 Table 10 in HOU3 compares the number of homes built and the ONS assumptions of net migration for the years 1991-2010.² There has been considerable variation in annual completions³. The 3 years 2005-2007 delivered very high numbers (733, 810 and 865 dwellings respectively), whereas recent years have all been below the overall average and below the current annual housing requirement of 525. In 2013 only 186 dwellings were built. With regard to net migration, peak years were 2002 (1,000 persons) 2005 (1,300) and 2006 (1,500). Other years since 2002 were either 700 or 500 persons per

¹ This figure is taken from the Census 2011. Whilst the Council suggests (WOLP1 2.23), that a lower vacancy rate could be applied, it has not done so in the projections it relies on by Hollis. I see no reason to use a rate lower than that in the most recent evidence.

² More recent figures on completions are included in HOU1, Table 13.

³ It was highlighted at the hearing that the Council's figures for housebuilding HOU3, Table 10/HOU1, Table 13 are generally higher than the figures recorded by DCLG, as set out in the hearing statement from Barton Willmore, Table 2. However, these differences are not material for the reasoning in this Note.

annum (ppa). So there is no simple, direct correlation between the 2 factors. Woodhead demonstrates that to get a reasonable correlation, a 2 year moving average for migration has to be used (HOU3 ,Table 5 6, paragraphs 6.21-2), but his analysis is in danger of making the issue unduly complicated.

4.4 The interim household projections based on 2011 SNPP (which were the starting point used in the SHMA) would have drawn on migration from the years between 2005-6 and 2009-10 (HOU1, App1, paragraph 4.6) so they would have included at least 1 year with the highest migration flow. The ONS 2012 projection would not have included a peak migration year. This change is illustrated in the lowering of the net average migration figure used in these 2 projections from 720ppa to 595ppa (Barton Willmore Hearing Statement, Table 1)⁴.

4.5 But the SHMA did not use the 2011 SNPP uncritically and made a downward adjustment to the migration assumptions used in its projection, giving a revised net migration figure for West Oxon of 593 ppa (SHMA, Table 20), which is almost the same as that in the latest ONS projection. Thus there is not the evidence to support the Council's contention that the SHMA's revised demographic starting point was biased by untypically high migrations flows. The difference in outcomes between the SHMA's adjusted projection and the latest DCLG projection must be the result of other factors, such as different Household Representative Rates (HRR) (see below).

4.6 The PAS Technical Advice Note⁵ indicates (6.24) that it is generally advisable to test alternative scenarios based on a longer reference period of 10-15 years, but not to go back earlier than the 2001 Census. That approach would seem appropriate here to even-out over a longer period the very high numbers for net migration in 2005 and 2006. The projection produced by Hollis based on average migration 2004-2014 serves this purpose (HOU1, Table 1).

4.7 Both Hollis' alternative projections adjust for Unattributable Population Change (UPC) as a component of migration. UPC for West Oxon is an overall negative difference of 527 between 2001-2011. Its inclusion by Hollis will have lowered the net migration figures used in his long and short term projections compared with those in Barton Willmore Table 1. There is no right or wrong answer as to whether an adjustment should be made for UPC. ONS do not include it in its projections because it cannot be ascribed with certainty to any one component of change. In any case, UPC will become less relevant in future projections. The PAS Technical Note (6.33-6.35) advises that the default option is to ignore it, but that this may be overridden by local evidence. UPC is not a substantial factor for West Oxon, but I consider that it is reasonable to have regard to it given that the SHMA (HOU2, paragraph 5.23) took it into account. Consistency of approach across the HMA is important. In any further work arising from this Note it would be best to model projections with and without UPC to test its significance.

4.8 Hollis' projection based on short term trends (2009-2014) should not be used to establish a demographic starting point. The net migration figure for the recent short term period is 472 ppa (excluding UPC). In each year of this period housing delivery

⁴ None of Barton Willmore's figures include any adjustment for Unattributable Population Change (UPC) whereas John Hollis' alternative projections in HOU1 do adjust for UPC as a component of migration. This is discussed later in this Note.

⁵ Planning Advisory Service *Objectively Assessed Need and Housing Targets* Technical advice Note Second Edition July 2015.

was considerably below the housing requirement in the plan. In as much as there is a link between the 2 factors, a projection based on this short term migration figure would be too low, since it would be embedding a significant trough in delivery - the opposite effect to the Council's concern with the SHMA. The selection by the Council of its preferred demographic starting point based on the average outputs of the long term and short term projections is therefore also unjustified, since it skews the outcome too much to a period of very low delivery. The next round of ONS population/DCLG household projections could well be lower than the current figures because of this drop in delivery. A cautionary approach will be needed to avoid low delivery arbitrarily justifying a lower future requirement.

4.9 The DCLG 2012 based household projection results in a need for 483 dpa over the plan period. John Hollis' projection based on migration over 10 years indicates a need for 491 dpa. These outputs are remarkably similar and both avoid being unduly influenced by untypically high migration. Subject to my comments on Household Representative Rates (HRR) below, they indicate that an up-to-date demographic starting point is around 490dpa. Whilst this is a material reduction from the adjusted demographic figure used in the SHMA, there is no evidence to indicate whether the use of such a figure would result in a change to the figure recommended in the SHMA, if all other assumptions had remained constant.

4.10 I am not going to give preference to one of these 2 projections over the other. In part this is because, as modelled by Hollis, the 2 projections produce very different projections for the resident labour force (HOU1, Table 5). This difference raises considerable uncertainties when trying to compare the likely increase in the local labour force with projections for economic growth and jobs. In any further work, the Council needs to be alert to the reasons for this disparity of outcomes.

4.11 Hollis uses the HRRs from the DCLG 2012 based projections and he specifically endorses the appropriateness of their use. The PAS Technical Note (6.36 -6.43) also generally endorses the latest HRRs as a new starting point and discourages any attempt to blend these with earlier rates - a practice that emerged because of the perceived shortcomings of the rates used in the interim 2011 SNPP based projections. Criticism of the 2014 HRRs focuses on the 25-34 age group. This still projects a substantial difference from the 2008 HRR for this group, whereas for all other age groups they are more closely aligned (see Hearing Statement by GL Hearn, Appendix 4). The continued decline in HRR for this younger age group may well reflect some suppression of household formation as a result of the recession, but it is difficult to judge the extent to which structural changes arising from the recession have in fact produced a permanent change to household formation. Recently proposed Government initiatives may have an effect (but these were not discussed at the hearing). There is not the evidence to recommend any specific adjustment, but in any further work the Council should be mindful that a demographic starting point of around 490 dpa may be embedding some suppression of household formation.

4.12 I need to comment on 2 further matters. Woodhead (HOU3, paragraph 6.32) and some other representors suggest that the extent by which West Oxon "over delivered" housing in the period 2006-2011 compared with the requirement applicable at the time in the South East Plan should be taken off the housing requirement. This over delivery amounted to about 1,400 dwellings. I do not consider that any such subtraction would be justified. As already highlighted, the thrust of National Guidance on this point is to

review the appropriateness of projections which might contain periods of unusual high growth. I have already done so. The residents of the additional 1,400 dwellings are now an integral part of the population of West Oxon and need to be included in future projections of population and household change. I note that the SHMA (HOU2, Table 90) added to the demographic starting points the shortfalls in delivery that occurred in the other Oxfordshire districts. However, those additions did not make any material difference to the recommended housing requirements for those districts because the housing needs arising either from the committed economic growth projection or to meet affordable housing needs were much greater. Conversely, subtracting a substantial figure for past "over delivery" from the calculated housing requirement for West Oxon would make a significant difference and mean that assessed needs would not be met. This would be contrary to Government policy.

4.13 Finally, I note that several representors consider that the SHMA is fundamentally flawed and suggest alternative methods for determining a housing requirement, which they consider should be lower than that proposed in the plan. However, much of the reasoning in those radical approaches simply does not reflect the aims of Government policy expressed in the NPPF to meet housing needs of all types (subject only to the test in paragraph 14) or national guidance on the appropriate methodology for assessing housing need.

5. Affordable Housing

5.1 The SHMA identifies a net annual need of **274** affordable dwelling for West Oxon (HOU2, Table 54). The Council recognises that the SHMA provides the most up-to-date, objective assessment of affordable housing need across the Oxfordshire HMA; that the assessment methodology is consistent with national guidance; and was agreed by all partners, including West Oxon (WOLP1, 2.36). However, the Council suggests that the figure for need should be lower, in contradiction to this general endorsement of the SHMA. In particular, the Council considers that it would be reasonable to apply an income threshold of 40%, rather than the 35% which is the basis for the SHMA's recommendation. In my experience, the 35% threshold is higher than thresholds commonly adopted in this type of exercise elsewhere, but is justified for the reasons set out in the SHMA (HOU2, paragraphs 6.17-6.20). I have seen no evidence of substance to suggest that a lower threshold is necessary here.

5.2 The Council highlights the reference in the SHMA (paragraph 6.81) to the fact that, in practice, some households are likely to be adequately housed whilst paying more than 35% of their income on housing and that if a 40% threshold were to be used then the need would be reduced, as shown in SHMA Table 57. However, the fact that some households do spend more than 35% of their income on housing is not a good reason to take a 40% threshold as justified for assessing the need for affordable housing. There is no evidence to indicate that circumstances in West Oxon are so noticeably different to the rest of the HMA as to justify a different threshold here, nor any real assessment by the Council as to whether it is reasonable to do so. In my view it is not, given that it represents such a substantial proportion of income.

5.3 The Council highlights (WOLP1, paragraph 3.39 and at the hearing) that with the inclusion of the pipeline of affordable housing developments, the identified need would be lower (SHMA, Table 55). However, in relying on the pipeline supply identified in the

SHMA there is a considerable risk of double counting and confusion when considering likely affordable housing delivery. I consider delivery further below.

5.4 The SHMA addresses the current backlog of affordable need over the 18 year assessment period. This approach is broadly accepted by most hearing participants in the context of the overall recommendations of the SHMA. In that context, I see no reason to disagree, given the substantial uplift in housing that the SHMA was recommending to address affordable housing need, amongst other matters.

5.5 I consider that the SHMA's recommended figure of a need for 274 affordable dwellings per annum is justified for the period 2013-2031. There are inevitably some weaknesses in a model which uses a detailed assessment of short term needs as part of the assessment of needs over the whole plan period, as acknowledged in the SHMA and highlighted by the Council (eg WOLP1, paragraphs 3.48 -3.49). But the SHMA follows national guidance. In any case, it is inevitable that needs will be reassessed during that period and the figure is not intended to remain fixed for 18 years without review.

5.6 I turn now to affordable housing delivery, to compare with the level of need. The Council's position is set out clearly in WOLP1, paragraphs 3.56-3.79 and accompanying tables. Some key points in using this data are as follows. Firstly, affordable housing delivery should be counted only from 2013, since that is the base date of the SHMA's assessment of such needs. Secondly, if actual provision in 2013-2015 is to be counted along with existing commitments at 1 April 2015 (as per WOLP1, pp19-20) then the pipeline supply referred to in the SHMA must be ignored. Thirdly, I have deferred to later hearings the viability and deliverability of the Strategic Development Areas allocated in the plan. Some of the landowners/promoters of those sites dispute their ability to deliver policy compliant levels of affordable housing as well as major items of infrastructure. Thus the delivery figures in WOLP1 (table at paragraph 3.62) have not been tested at this stage and these figures are accepted only for the purposes of the present calculation. Finally, the implications of the Housing Bill and of the Government's Autumn Statement on the delivery of affordable housing have not yet been taken into account, but will need to be in due course as the consequences of both become clearer.

5.7 The Council's assessment of delivery of affordable housing includes affordable housing expected to be delivered from suitable SHLAA sites (WOLP1, paragraph 3.64). These are not allocated in the plan, but are needed to make-up overall housing delivery to the requirement of 10,500. Assuming that the affordable housing policy remains unchanged, the assumption of delivery from this source is reasonable.

5.8 In addition, the Council has included in its calculation 300 affordable dwellings from large site windfalls (WOLP1, paragraph 3.67)⁶. Before and at the hearings, I indicated that I could not see the justification for large site windfalls. If the SHLAA is robust it should have captured most large sites likely to come forward. In as much as some suitable SHLAA sites might not come forward, alternative large site windfall sites would be a substitute for them and any affordable housing provision they make would be a replacement for any lost from the assessment made in paragraph 3.64. Alternatively, if the SHLAA sites referred to in the plan were translated into allocations (as discussed at the hearing and on which I comment in my Part 2 Note) then any large site windfalls that were permitted would, in effect, be increasing housing provision/delivery above

⁶ These are sites above the SHLAA threshold of 10 dwellings.

10,500. Clearly, if overall housing provision/delivery increases, more affordable housing can be expected. That is the reason national guidance indicates that consideration should be given to such an uplift to boost affordable housing delivery.

5.9 If the Council is confident of large site windfalls then that weighs in favour of an additional uplift to boost affordable housing delivery. For present purposes, I have excluded the 300 figure in paragraph 3.67 from expected delivery. Finally, the Council estimates that 100 additional units will come from "other sources". Given the modest nature of this figure in the overall balance, it was not discussed at the hearing, but I have included it for this calculation.

5.10 Taking off the 300 dwellings for the reasons given above, about 2,689 affordable units are expected to be delivered in the period 2013-2031 (WOLP1, paragraph 3.76, adjusted downwards). This compares with an assessed need for 4,932, based on the SHMA's 35% income threshold. There is clearly a very substantial shortfall. Given the NPPF's definition of affordable housing, private rented accommodation, where households unable to compete in the market may be in receipt of public subsidy (housing benefit), should not be taken into account in determining the need for affordable housing or how to respond to that need.

5.11 I have seen no evidence of any careful, balanced consideration by the Council of the extent to which the gap in affordable housing provision should be narrowed by an uplift in market housing. Any assessment previously made by the Council has been on the basis of a new demographic starting point that is too low (446 dpa, WOLP1, paragraph 3.29); on an unjustified income threshold (40%); and with undue regard to the past limited success in delivering affordable housing (see below). The Council needs to address this matter afresh in the light of these Preliminary Findings and the need for consistency with the SHMA's core assumptions.

5.12 The Council consider that the SHMA adopts a too mechanistic approach in uplifting housing to ensure that the needed affordable housing is delivered. The Council considers that the SHMA's assumption of 40% delivery of affordable housing from all housing development in West Oxon is unrealistic given the policy threshold of 10 dwellings at which the policy takes effect (as proposed in the local plan) and different percentages to be applied in different parts of the district. The SHMA had to make an assumption of the appropriate percentage to apply in advance of local plans coming forward. If the SHMA was too optimistic, it would point to a need for a *greater* uplift to be considered, not a lower uplift as the Council suggest. The Council also highlights relatively low levels of affordable housing delivery in the past (HOU1, Table 13) which have averaged 20% over the past 14 years. However, given that national policy seeks a step-change in housing delivery and for all needs to be met where possible, the limited success of the past should not be used to justify continued under-provision. I have seen no specific evidence, such as from Registered Providers, of insurmountable difficulties in stepping-up delivery and the Council should be actively considering how to maximise the delivery of affordable housing.

6. Economic growth and jobs

6.1 The SHMA took account of housing needs based on securing a sufficient workforce to deliver the jobs anticipated to arise under what it terms the *Committed Economic Growth* scenario (eg SHMA, Table 90). This scenario took account of factors expected to

stimulate above-trend growth in employment in Oxfordshire (SHMA, 4.19-4.20). This scenario was assessed in more detail in *Economic Forecasting to Inform the Oxfordshire Strategic Economic Plan and SHMA* February 2014 (ECON2). This scenario underpins the stated ambitions of the Local Economic Partnership (LEP) and provided the justification for bids for substantial public investment to help bring about this growth (such as through improvements in critical transport infrastructure). A number of strands of such investment are being co-ordinated by the OGB. The Council is part of the LEP and OGB (as already highlighted) and there is no evidence to suggest that the Council is seeking to formally dissociate itself from the economic aims of these bodies.

6.2 Notwithstanding the above, the Council now considers that this *Committed Economic Growth* scenario should not be taken into account in deriving the housing requirement for West Oxon. The Council considers that the plan's housing requirement appropriately aligns with the baseline economic projection. As explained in ECON2, the baseline projections assumes the continuation of the historical relationship between growth in the local area relative to the South East or UK (dependent on the type of business concerned).

6.3 I recognise that, as highlighted by the Council, economic forecasts for Oxfordshire/West Oxon have changed considerably over recent years, must be treated with a degree of caution and will no doubt change again over the plan period. Nevertheless, the Government's aim, as expressed in the NPPF, is that the planning system should facilitate economic growth and Councils must plan positively to secure it. Strategies for housing, employment and other uses should be integrated (NPPF 158). Local Plans should be aspirational, but realistic (NPPF 154). For the following reasons I consider that the Council is not justified in planning on the basis of the economic baseline.

6.4 Firstly, it is inconsistent with its support for the LEP and work of the OGB. As with housing issues across an HMA, so economic issues are best addressed consistently across an economic area, as those bodies seek to do, and as reflected in the recommendations of the SHMA. There is no evidence of the Council seeking, let alone obtaining, the agreement of partner authorities to it assuming a lower rate of economic growth in West Oxon than the rest of the County, or of considering with them the wider implications of doing so. Indeed, the Council states that it remains fully supportive of the LEP and the overall economic ambitions contained in the Strategic Economic Plan (WOLP1, paragraph 3.84). I cannot see how both positions are tenable.

6.5 Secondly, my understanding is that the other emerging local plans in Oxfordshire and Cherwell's adopted local plan are all planning to accommodate the *Committed Economic Growth* scenario. Such commitment across most of Oxfordshire is a strong factor in making that level of growth become a reality and not remain only an aspiration.

6.6 Thirdly, the *Committed Economic Growth* scenario is based on the identification of a range of significant planned projects likely to boost economic development (ECON2, chapter 4). It is not an arbitrary increase over the baseline. In the light of the unique opportunities for economic development in parts of Oxfordshire, it is surely a location where there is considerable economic potential to be realised, but which might be inhibited if not actively planned for. Planning to meet the *Committed Economic Growth* scenario fits well with the NPPF's aim to: *respond positively to wider opportunities for growth* (paragraph 17, 3rd bullet).

6.7 Fourthly, the growth rate in the economic baseline (0.6% to 2021 and 0.5% pa thereafter, ECON2 p9) is below the most recent economic forecasts for West Oxon from 3 leading forecasting bodies. These project rates of 0.8% or 0.9%. These forecasts and related predicted job growth match the predicted 0.8% growth for West Oxon in the *Committed Economic Growth* scenario (Barton Willmore Hearing statement, Tables 4/5).

6.8 Fifthly, in as much as West Oxon has suffered some specific job losses in high profile sectors since the SHMA's assessment⁷, I consider that this negative impact has been more than offset by another opportunity. Employment growth (contractors and indirect effects) has taken place and is likely to continue to arise from major changes at RAF Brize Norton (WOLP32, particularly pp6-7) which are not referred to in the justification for Committed Economic Growth scenario

6.9 The Council has other concerns with the economic modelling in the SHMA. HOU3 and some of the other submissions from the Council contest that the whole model is too circular and is flawed. On reflection, however, the Council did not pursue this fundamental criticism of the SHMA at the hearing. In my view, the SHMA rightly seeks to integrate economic and housing projections. It is nevertheless right to be alert to the fact that the economic projections themselves incorporate a population projection. In this case, the baseline projection incorporates ONS 2011 based SNPPP (ECON 2, p2). A substantial proportion of the predicted economic growth in West Oxfordshire is a product of population growth (eg retail and health sectors). In as much as a revised demographic starting point is now justified and is lower than that used in the SHMA then there would be less growth from this factor.

6.10 The Council emphasises that West Oxon is not closely related to the key locations for growth in Oxfordshire, but this is reflected in the different growth rates for the districts in the *Committed Economic Growth* scenario. For example, the Vale of White Horse has a growth rate of 1.5% compared with West Oxon's 0.8% (ECON2, Table 5.2).

6.11 The Council considers the *Committed Economic Growth* scenario is a "policy-on" position and therefore should not be taken into account in identifying the objective assessment of need. But any necessary distinction between policy-off and policy-on considerations does not change the position on this matter here. In identifying the appropriate housing requirement in the Plan, "policy-on" matters relating to an agreed economic strategy (as expressed by the LEP and OGB) should be taken into account so that there is effective integration between housing and employment strategies.

6.12 I accept that if West Oxon were to plan for 525 dpa rather than the 660dpa recommended in the SHMA, then across Oxfordshire as a whole there would still be sufficient housing to support a labour force consistent with *Committed Economic Growth* because of the additional housing also recommended to meet affordable housing need (WOLP1, paragraphs 3.93-3.94). However, such an argument could be used by any of the other Councils to justify a lower housing requirement. There is no justification for an exception to be made for West Oxon. Collective and consistent action across the HMA would soon unravel if such arguments prevailed.

6.13 The Plan does not contain any figure for job growth. Although I am firmly of the view that the Council should adopt the *Committed Economic Growth* scenario to plan for

⁷ eg the closure of Caterham F1 which was an advanced engineering company highlighted for growth in the Committed Economic Growth scenario (ECON2, p23).

higher growth than the baseline, I am not in a position to specifically endorse the related projection of job growth of 7,900 for West Oxon (ECON2, Table 5.2). If the Council chooses to adopt a new demographic starting point then that projection may be different.

6.14 The baseline scenario now preferred by the Council projects job growth of 5,100 additional jobs. The Council see this as compatible with increase in the local labour force arising from the proposed 10,500 dwellings. The modelling by Hollis (HOU1, App 1, Table 2) projects a resident labour force of just over 6,000 which, allowing for commuting and other adjustments, equates to sufficient local workers to support about 4,755 jobs (Hearing Statement, p15). However, as already highlighted, labour force projections vary widely depending on the particular demographic inputs, even for a similar overall housing figure. Accordingly, in any further work, the Council should be alert to these variations and may need into take account of a range of possible labour force projections in determining whether the plan's housing provision would provide sufficient local workers to support the *Committed Economic Growth* scenario.

6.15 The plan refers (paragraph 6.18) to evidence that around 60ha of employment land is required over the plan-period. The Council's most up to date evidence on employment land requirements is in ECON1 (*West Oxfordshire Economic Snapshot* January 2015). In section 6.5 this sets out employment land requirements based on the SHMA's *Alternative Population Scenario* and then sensitivity tests its conclusions against the *Committed Economic Growth Scenario*. On current evidence, the quantum of 60ha is about right to facilitate the higher growth that I consider should be planned for, but there appear to be issues with the availability of some of the land. The distribution and deliverability of employment land is a matter for later consideration and was not discussed at the November hearings.

7. The needs of Oxford City

7.1 The SHMA identifies substantial housing needs for Oxford City. Very recently the OGB has agreed a working assumption of 15,000 homes to be found outside the City within the adjoining districts to meet the City's unmet needs (WOLP37 and WOLP34). The OGB has been coordinating work to meet the City's needs since the beginning of 2015. Unfortunately, the timetable for completing the various work streams has been progressively slipping. The most recent timetable (WOLP34, Appendix *Post SHMA Strategic Work Programme*) indicates July 2016 for the publication of a statement of cooperation setting out an agreed distribution, but some of the core evidence should be completed by April 2016.

7.2 The submitted plan does not identify or seek to address any unmet needs of Oxford City. The Council envisages a local plan review as the vehicle to address any apportionment made by the OGB next July. The Council is now committed to completing such a review within 2 years and a review is included in the Council's Local Development Scheme (LDS). The Council sees its approach as consistent with that accepted by the Inspector for the Cherwell local plan. However, I can understand the concerns of those, including Oxford City, who consider that such a timescale may easily slip, given how long it has taken to produce the current local plan. Whilst Oxford City considers that the Duty to Cooperate has been *broadly complied with*, it considers the local plan to be unsound in not addressing Oxford's needs in some way (WOLP37, paragraph 2.3c).

7.3 I consider compliance with Duty later in this Note. The NPPF refers to planning strategically across local boundaries in paragraphs 178-181. The soundness test of *positively prepared* states that the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. In my view, this requirement would normally mean that a plan should seek to address the needs of an adjoining area where there is clear evidence of unmet need, as is the case here. However, where well before submission of the plan, the relevant authorities have made a commitment to address those needs; have established a firm mechanism to assess the most sustainable distribution of such needs; and intend to apportion them to the adjoining districts, then it is not unreasonable for plans that are already well advanced not to be delayed whilst that process is completed. That was the position at Cherwell where the plan will have been adopted for a year before the final apportionment is made by OGB.

7.4 Following the process established by the OGB is more likely to lead to the most sustainable pattern of development compared with each local plan independently exploring how to meet some element of the unmet need. The latter would most likely result in the last local plan to be prepared having the largest share of unmet needs to accommodate. Oxford City did not seek provision for any of its needs to be met in West Oxon at an early stage in the plan process⁸. In addition, I have not seen any specific subsequent request from the City to the Council to make provision for a specific figure or share of its needs. In this context, it was not essential for the Council to have included in this plan at the outset a figure for the unmet needs of Oxford, since any such figure would have been fairly arbitrary. Unfortunately the position is more complicated than this.

7.5 The timescales for the adoption of this plan and the finalisation of the apportionment of unmet needs have always overlapped. Prior to submission, the Council should have been alert to the likely difficulties that could arise. When the Council published this local plan in Spring 2015, the OGB timetable for apportioning Oxford's needs was September 2015 (WOLP34, Appendix *Post SHMA Strategic Work Programme*), well before this plan could have been adopted. The Council's LDS of January 2015 (SD6) indicates an adoption date of March 2016. It was only after submission that the OGB reset the timetable with a new deadline for completion of its work by March/April 2016. The date of adoption in the Council's Addendum LDS (DS6a) is now Spring 2016. So the Council should have been conscious that the local plan would not be adopted until after the OGB had made its final apportionment and should have considered the implications. As a result of my conclusions in this note, I cannot see how this plan could be adopted before July 2016, which is the latest date for the final decisions of the OGB.

7.6 In eventually considering the soundness of this plan (following the further work and consultation on the matters of concern in this Note) regard would have to be given to any apportionment to West Oxon made by the OGB. If any such apportionment is made then that would become part of the housing need for the district. Any such apportionment is not immediately a definitive housing requirement, since it must be taken through a local plan process to test its deliverability and environmental impact. Nevertheless, it will be a figure of considerable significance and weight, since it will have

⁸ See for example the letter from Oxford City Council to West Oxon, 16 April 2013 confirming that the Duty is regarded as fulfilled (SD4, App 2).

emerged from an evidence-based process to inform spatial options for growth outside Oxford City. My initial view is that it would need to be taken into account in calculating the 5 year land supply.

7.7 If the local plan were to proceed to adoption without having regard to any apportionment that had been made by the OGB, it would immediately be out of date. Such a plan would be inconsistent with one of the aims of the plan-led system which is to bring more certainty as to where development would take place. In addition, the development strategy of the plan may well not be appropriate to accommodate any significant needs from Oxford and additional new greenfield sites would need to be found. It would not be conducive to planning for sustainable development for potential additional sites to meet West Oxon's needs (arising from an increased housing requirement) to be considered in isolation from sites required for Oxford City's needs. The combination of needs might well result in a different scale/location of site being required, changing the mix of relevant considerations in the choices that have to be made.

7.8 Having identified this problem, I cannot be prescriptive as to how it should be resolved. In WOLP37, paragraph 4.2, the Council and Oxford City Council agree that if I concur with the City's concerns (which, on this point, I largely do) then the matter can be addressed through main modifications to the plan. I recognise that if the OGB were to decide that no share of Oxford's needs should be accommodated in West Oxon and all the City's needs were to be met in other districts then this difficulty would not arise. However, it would be a very high risk strategy to rely on that outcome.

8. Duty to Cooperate

8.1 The Council's position is set out in its *Statement of Compliance with the Duty to Cooperate* (SD4). The only aspects in serious dispute relate to its approach to the SHMA and the unmet needs of Oxford City.

8.2 I consider that the joint commissioning and joint endorsement of the SHMA for the Oxfordshire HMA and the mechanism and work streams put in place (before submission of this plan) by the OGB to address the needs of Oxford City are very important elements in demonstrating compliance with the Duty.

8.3 However, the Council's actions (before submission) in commissioning and using evidence and argument that criticised the methodology of the SHMA in several key respects (as explained above) were in danger of jeopardising the use of the SHMA across the rest of Oxfordshire and thus of undermining the effectiveness of strategic planning in the County. But as I have been largely unconvinced by those arguments, the actual damage caused by the Council's actions in this regard should not be too great. Accordingly, strategic planning can continue to be effective on the basis of the SHMA (or any subsequent joint update). On this basis, I am able to conclude that the Council has fulfilled the Duty. This favourable conclusion does not however change my view that the Council has not sufficiently worked with its neighbours across the HMA in determining its own housing requirement and thus fails soundness in this regard.

9. Other Statutory Matters

Sustainability Appraisal (SA)

9.1 At submission, I consider that the SA had adequately addressed reasonable alternatives for a plan seeking only to address the needs of West Oxon. Two alternative options (a *new village* and *concentration of development along transport corridors*) were dropped following the Issues and Options Stage in 2008 (CD2 paragraphs 4.7-4.10). I consider that the rejection of these 2 options was reasonable for the reasons the Council gives in the context of meeting the needs of West Oxon alone. If any further work undertaken by the Council anticipates some apportionment of Oxford's needs to West Oxon, then the range of alternative strategies to be considered in the SA will need to be reviewed.

9.2 Other, more generic criticisms were made regarding the SA. The Council's response to these criticisms is in WOLP3. For the reasons given by the Council, I am satisfied that the SA is adequate in its general scope and approach. (I am not however commenting here on its assessment of individual sites.)

Habitat Regulations Assessment (HRA)

9.3 In my prehearing questions I sought clarification regarding the HRA and the Oxford Meadows SAC. WOLP31 confirms that Natural England are content with the HRA. To ensure consistency between the assumptions/recommendations made in the HRA and the plan, additional text is needed along the lines proposed by the Council (WOLP38, FMs 1, 21 and 24). These should be included in any future consultation on changes.

9.4 I am satisfied that all other statutory requirements have been met.

10. Overall Conclusion and Way Forward

10.1 The local plan's housing requirement of 10,500 has not been justified. The Council's evidence to support its housing requirement has been worked-up independently of its partners in the rest of the HMA without due regard for consistency across the HMA and the potential wider implications of its actions.

10.2 The Council's new preferred demographic starting point is too low because it has been unduly influenced by recent years of very low delivery (well below the annual rate proposed in the plan).

10.3 The Council has not given explicit consideration, based on appropriate assumptions, to an uplift in housing provision to narrow the substantial gap between the need for affordable housing (as identified in the SHMA) and the likely delivery of affordable housing from the plan's proposed 10,500 dwellings.

10.4 The Council's preference for a *baseline* economic growth rate rather than *Committed Economic Growth* outlined in the SHMA and endorsed by all the other Councils in Oxfordshire is unjustified and out of step with the Government's aims for economic growth. I am not satisfied that the local plan's housing requirement would provide sufficient labour force to support Committed Economic Growth.

10.5 I am unable to identify what the housing requirement should be. It is likely to be between the recommended figure in the SHMA (660dpa) and that in the plan (525dpa).

The SHMA provides a recommended housing figure for West Oxon developed on assumptions that would largely overcome the above shortcomings. If, however, the Council wants to do further work in the light of the above findings, then it is essential that the methodology is first shared with its partner authorities in the HMA and that the Council considers any concerns raised. The conclusions of the Council's work will also need to be shared and the implications considered. If the housing requirement increases, then additional sites and/or changes to the existing site allocations will need to be made.

10.6 In any further work, the Council will need to consider the implications for the plan of any apportionment to West Oxon of Oxford City's unmet housing needs due to be made by the OGB in July 2016. If this is not taken into account the plan would be out of date before it can be adopted (assuming that some apportionment is made to West Oxon).

10.7 Once the Council has reflected on these findings, it will need to decide whether to withdraw this plan or put forward changes to make it sound. If it wishes to proceed with this plan, it should set out an indicative timetable for the further work which is necessary, including public consultation on proposed changes and appropriate recording and commentary on the further representations made. Once I receive that indicative timetable, I will be able to determine for how long I should suspend the Examination.

10.8 Part 2 of my Preliminary Findings comment on matters considered under Issues 3 and 4 at the hearings in November. Some further work will be identified in that Note, although it does not have the strategic significance of the matters in this Note.

Simon Emerson

Inspector

15 December 2015

APPENDIX 6

**PAGE 13, HIGH COURT JUDGEMENT BETWEEN OADBY & WIGSTON BOROUGH
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GOVERNMENT (2) BLOOR HOMES LIMITED, 03 JULY 2015**

ii) Similarly with affordable housing. The SHMA identified the net affordable housing requirement as 160 dpa (see paragraph 26 above). The Council's determination of a FOAN of 80-100 dpa, because the affordable housing needs could in effect be met by the private sector and/or by adjacent areas, was again a policy on decision. Again, Mr Taylor submitted, on the basis of the SHMA assessment of housing needs to meet affordable housing requirements, "the only reasonable conclusion is that a figure substantially in excess of 150 dpa is the appropriate figure to adopt as the housing requirement" (paragraphs 96-123 of Mr Taylor's written closing submissions, the quotation coming from paragraph 120).

32. In his decision letter, the Inspector clearly accepted Mr Taylor's submission that the housing requirement range of 80-100 dpa was policy on, substantially for the reasons given by Mr Taylor. In particular, the Inspector considered that, even if the SHMA figures were policy off for the HMA looked at as a whole, they were policy on for the Council looked at individually – because the distribution of the identified need across the HMA would be a policy on decision, and there was no evidence that the apportionment had been agreed or tested at a local plan examination (paragraph 30 of his decision letter). He went on to find that, with regard to the FOAN, "the figure could be in the order of 147 per annum" (paragraph 33), i.e. 735 over the five-year period, to which had to be added the 20% buffer (147) and the backlog (93). That was an aggregate of 975 dwellings, or 195 dpa. The housing supply figure of 705 dwellings (see paragraph 21(i) above), represented only 3.6 years' housing on that basis, and the Council had failed to demonstrate a five year housing land supply.

Discussion

33. Although the SHMA purports to be policy off, I agree with the Inspector's conclusion that it is policy on, for the reasons put forward by Mr Taylor.

34. The Council's case had within it this conundrum: on the basis of the SHMA, the Council was working to a purportedly policy off housing requirement figure of 80-100 dpa – but the SHMA itself assessed the housing need taking into account economic growth trends at 173 dpa, and the full affordable housing need alone at a net 160 dpa. However:

i) For an authority to decide not to accommodate additional workers drawn to its area by increased employment opportunities is clearly a policy on decision which affects adjacent authorities who would be expected to house those additional commuting workers, unless there was evidence (accepted by the inspector or other planning decision-maker) that in fact the increase in employment in the borough would not increase the overall accommodation needs. In the absence of such evidence, or a development plan or any form of agreement between the authorities to the effect that adjacent authorities agree to increase their housing accommodation accordingly, the decision-maker is entitled to allow for provision to house those additional workers. To decide not to do so on the basis that they will be accommodated in adjacent authorities is a policy on decision.

APPENDIX 7

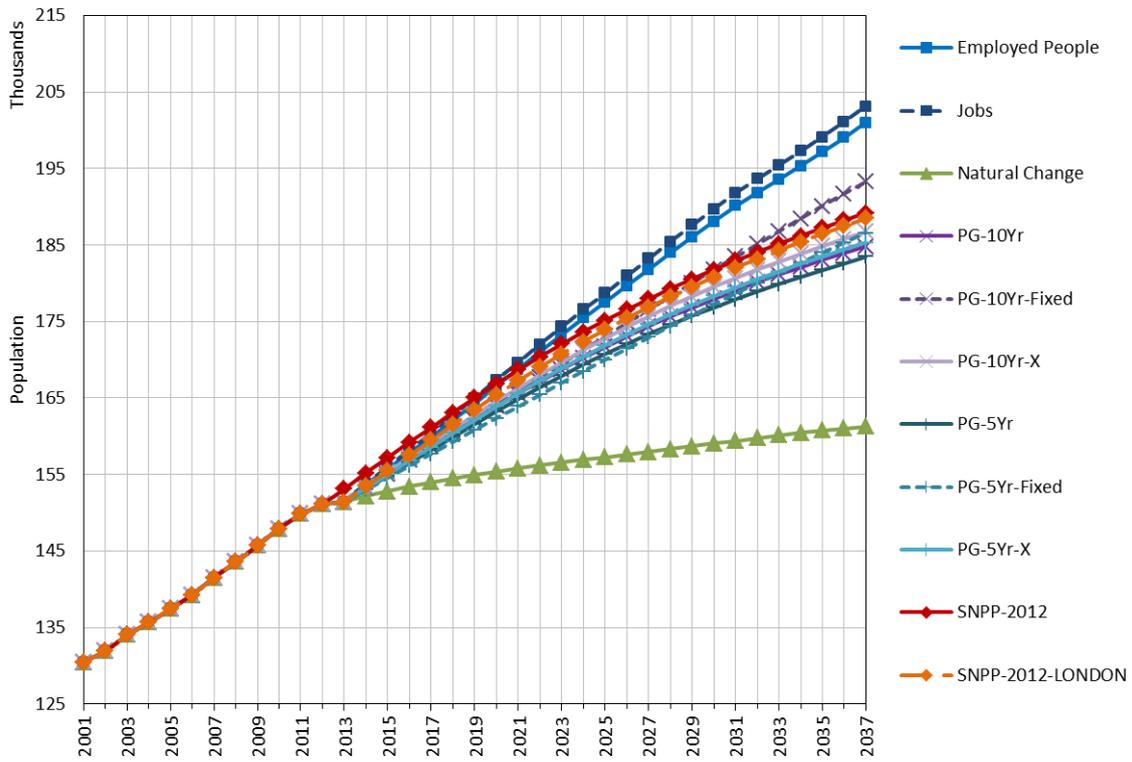
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South Cambridgeshire

Trend Scenarios

- 6.223 The **SNPP-2012** scenario records a 23.5% growth in South Cambridgeshire's population to 2037 and an estimated dwelling requirement of 824 per year, assuming that household formation rates follow the trend in the 2012-based household model.
- 6.224 The migration uplift associated with the GLA's **Central** scenario (**SNPP-2012-LONDON**) suggests slightly higher population growth at 24.5% to 2037, with an associated annual dwelling requirement of 815 per year.
- 6.225 The alternative **PG** trend scenarios derive alternative growth outcomes based on the last five and ten years of migration history, using either migration 'rates' or 'fixed' migration counts to determine future assumptions. The migration rates approach ensures that levels of migration are determined by changes to the population and age structure of both the UK reference population (which drives in-migration) and South Cambridgeshire's own population (which drives out-migration). The 'fixed' scenarios assume that historical migration levels are replicated in the future, regardless of changes to population size and age structure. The 'X' scenarios use the migration rates approach but consider the growth outcomes that result from the exclusion of UPC from the historical migration statistics.
- 6.226 The **PG-10Yr**, **PG-5Yr** and **PG-5Yr-Fixed** scenarios suggest population growth rates that are lower than the **SNPP-2012**, reflecting longer-term net migration assumptions in the **SNPP-2012** that are higher than recent historical levels. The **PG-10Yr** growth rates are higher than the **PG-5Yr**, alternatives, due to the lower levels of migration experienced in the latest years of the historical period. The **PG-10Yr-Fixed** scenario suggests higher growth, with no change in net migration to reflect changing population totals and age structure.
- 6.227 The 'X' scenarios imply higher rates of population growth than the equivalent scenarios that include UPC in the historical data; a reflection of the adjustment that was allocated to the population to account for an overcount between the 2001 and 2011 Censuses.
- 6.228 The **Natural Change** scenario, excluding the impact of migration in its forecast, suggests population growth of 6.5% to 2037, with an annual dwelling requirement of 377 per year.

SOUTH CAMBRIDGESHIRE



Scenario	Change 2013 - 2037				Average per year		
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings	Jobs
Jobs	51,659	34.1%	25,009	40.7%	1,532	1,073	1,046
Employed People	49,536	32.7%	24,182	39.4%	1,456	1,037	1,000
PG-10Yr-Fixed	41,829	27.6%	18,305	29.8%	1,077	785	786
SNPP-2012-LONDON	37,061	24.5%	19,011	30.9%	983	815	729
SNPP-2012	36,044	23.5%	19,217	30.9%	941	824	710
PG-10Yr-X	35,278	23.3%	17,889	29.1%	842	767	673
PG-5Yr-Fixed	35,140	23.2%	15,475	25.2%	832	664	642
PG-5Yr-X	33,842	22.3%	17,053	27.8%	790	731	643
PG-10Yr	33,349	22.0%	16,952	27.6%	767	727	625
PG-5Yr	32,033	21.2%	16,339	26.6%	712	701	605
Natural Change	9,812	6.5%	8,796	14.3%	0	377	123

Note: Household and dwelling estimates based on HH-12 assumptions

Note: This project does not produce a recommended or preferred demographic forecast for any local authority area. Rather it presents a range of scenarios to inform further assessment and consideration by the individual local authorities. Local circumstances may dictate that certain scenarios are more appropriate than others but, for completeness, all scenarios are presented here.

Figure 23: South Cambridgeshire, HH-12 scenario outcomes

Jobs-led Scenarios

- 6.229 The employment forecasts from the 2014 EEFM are higher than the previous 2013 output, with the annual growth in total jobs estimated at 1,046 per year in the latest data, compared to annual growth of 782 per year in the 2013 statistics.
- 6.230 Population growth associated with the **Employed People** and **Jobs** scenarios is 32.7% and 34.1% respectively, with a range of annual dwelling requirement of 1,037-1,073 per year. These dwelling growth outcomes are higher than the **SNPP-2012**, which assumes a lower annual net migration impact.
- 6.231 These outcomes assume that jobs growth continues at its 2031 level to the end of the forecast period. They also assume a declining unemployment rate to 2031 but an economic activity rate for the population aged 16-74 that largely remains at its 2011 level of 74.6% in 2031. The declining unemployment rate will reduce the requirement for higher net in-migration to meet anticipated annual jobs growth but the static economic activity rates will have little impact on this.
- 6.232 The commuting ratio reduces from its 1.06 Census figure to reach 1.00 in 2031. This suggests an improvement in self-containment, contributing to the reduction in the requirement for net in-migration to satisfy the forecast jobs growth.
- 6.233 Each of the trend scenarios has been run with the inclusion of the EEFM assumptions on unemployment, commuting and economic activity, providing jobs growth outcomes from each scenario that can be compared to the **Jobs** and **Employed People** alternatives.

Household Formation & Dwelling Growth

- 6.234 The DCLG's 2012-based household model has provided an update to previous 2008-based and 2011-based household formation data and assumptions.
- 6.235 For direct comparison with previous assumptions, the 2012-based (HH-12) dwelling growth outcomes for each of the phase 7 scenarios are presented alongside comparable outcomes using the 2008-based (HH-08) and 2011-based (HH-11) household data.
- 6.236 For all scenarios, the HH-12 results suggest an average annual dwelling requirement that is generally higher than the HH-11 outcomes but lower than the HH-08 outcomes.

Table 28: South Cambridgeshire, dwelling growth requirements comparison

Scenario	Average annual dwelling requirement (2013–2037)		
	HH-08	HH-11	HH-12
Jobs	1,125	1,036	1,073
Employed people	1,089	1,001	1,037
PG-10Yr-Fixed	905	813	785
SNPP-2012-LONDON	878	796	815
SNPP-2012	869	791	824
PG-10Yr-X	839	759	767
PG-5Yr-X	812	735	731
PG-5Yr-Fixed	802	718	664
PG-10Yr	798	716	727
PG-5Yr	781	702	701
Natural Change	408	312	377

APPENDIX 8
APPEAL DECISION 18 BOXWORTH END SWAVESEY (APPEAL REF:
APP/W0530/W/15/3139078)

Appeal Decision

Site visit made on 16 February 2016

by Robert J Jackson BA MPhil DMS MRTPI MCI

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 12 May 2016

Appeal Ref: APP/W0530/W/15/3139078

18 Boxworth End, Swavesey, Cambridgeshire CB24 4RA

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
 - The appeal is made by Mr & Mrs R Mallindine against the decision of South Cambridgeshire District Council.
 - The application Ref S/0875/15/OL, dated 25 March 2015, was refused by notice dated 28 October 2015.
 - The development proposed is development of 30 new dwellings comprising 18 market and 12 affordable units plus open space, children's play area and landscaping with all matters reserved save for access.
-

Decision

1. The appeal is allowed and planning permission is granted for development of 30 new dwellings comprising 18 market and 12 affordable units plus open space, children's play area and landscaping with all matters reserved save for access at 18 Boxworth End, Swavesey, Cambridgeshire CB24 4RA in accordance with the terms of the application, Ref S/0875/15/OL, dated 25 March 2015, subject to the conditions set out in the attached Schedule.

Application for costs

2. An application for costs was made by Mr & Mrs R Mallindine against South Cambridgeshire District Council. This application is the subject of a separate Decision.

Procedural matters

3. The application is for outline planning permission with all matters except access reserved. The application was accompanied by a Proposed Masterplan but this is stated only to be illustrative. I have dealt with the appeal on this basis.
4. A completed revised Planning Obligation under Section 106 of the Town and Country Planning Act, 1990 (as amended) dated 7 March 2016 was submitted. This provides for affordable housing, open space, contributions towards education, household waste receptacles and a monitoring contribution. I will discuss the implications of this later in this decision.
5. Following the decision of the Court of Appeal in the case of Suffolk Coastal District Council & Hopkins Homes v SSCLG¹ the parties were given the

¹ [2016] EWCA Civ 168

opportunity of commenting on the issues raised by this case. I have had regard to the responses received in my decision.

Main Issues

6. The main issues in this appeal are:

- whether the proposed development would provide a suitable site for housing, having regard to the principles of sustainable development and housing land supply;
- the effect on the character and appearance of the area;
- whether the proposal would set a precedent for other development; and
- the effect of the proposal on the provision of affordable housing, open space, education and household waste receptacles.

Reasons

7. The appeal site lies towards the southern end of the village of Swavesey in an area known as Boxworth End. The pattern of development in the area is predominantly made up of frontage development, although there is some development in depth. In particular, a short way and separate to the north is the Swavesey Village College where the buildings are set back from the road with the playing fields behind that.
8. The countryside is generally flat although there are variations in the topography which mean that the village can only be seen from certain viewpoints. The fields are surrounded by hedgerows which also have the effect of limiting views of the village.
9. The appeal site currently forms the side garden of 18 Boxworth End which is laid to lawn. The appeal site then extends to an area of less well maintained ground which was previously an orchard and beyond that into a rectangular field (the housing field) which is currently enclosed by hedgerows. These hedgerows are of varying quality and height appearing from within the site to be quite gappy or made up of brambles. However, when viewed from further distance these gaps are less pronounced.
10. Further to the west is another field surrounded by hedgerows which is in the same ownership as the appeal site. This field (the recreation field) lies behind the Village College playing fields and is subject to the Planning Obligation.
11. To the north of the appeal site is a detached dwelling, 10 Boxworth End, with a number of outbuildings including some recently constructed stables. I am informed that planning permission has been granted for a single dwelling to the rear of this dwelling.
12. Access would be created to Boxworth End by demolishing the existing boundary wall. The illustrative layout shows two detached dwellings a short distance to the rear of Nos 10 and 18 with the remainder of the dwellings on the housing field. A Local Area of Play is shown to the west of an existing pond towards the middle of the site.

Sustainable Development

Development Plan policies

13. The development plan for the area comprises the South Cambridgeshire Core Strategy DPD (CS) and the Development Control Policies (DCP) adopted respectively in January and July 2007. I have not been provided with the text of Policy DP/7 of the DCP but from the officer report it is clear this normally only permits development for agriculture, horticulture, forestry, outdoor recreation and other uses which need to be located in the countryside.
14. The majority of the site, that is the housing field, lies outside the village framework of Swavesey and this would therefore represent development in the countryside. As such the proposal would be contrary to the development plan. Section 38(6) of the Planning and Compulsory Purchase Act 2004 makes it clear that this determination should be in accordance with the terms of the development plan unless other material considerations indicate otherwise.
15. Policy ST/6 of the CS defines Swavesey as a Group Village where residential development up to an indicative maximum scheme size of 8 dwellings will be permitted within the village framework. The policy indicates, exceptionally, that schemes of up to 15 dwellings may be permitted where this would make the best use of a single brownfield site.
16. I have also been referred to three specific policies of the DCP. Policy DC/2 which sets out various criteria for the design of new development, including that any development should preserve or enhance the character of the local area. Policy DC/3 sets out various requirements for development, subject to the nature, scale and economic viability. These include the provision of affordable housing, appropriate access, and outdoor play space. It also indicates that permission will not be granted where the proposal would have an unacceptable adverse impact on, amongst others, village character and the countryside and landscape character.
17. Thirdly, Policy NE/4 indicates that development will only be permitted where it respects and retains or enhances the local character and distinctiveness of the Landscape Character Area in which the site is located. In this, the site lies within Natural England's national character area of the Bedfordshire and Cambridgeshire Claylands.

Policies for the supply of housing

18. The National Planning Policy Framework (the Framework) indicates in paragraph 47 that it seeks to boost significantly the supply of housing, and seeks local planning authorities to ensure that they have a five-year supply of deliverable housing sites. Paragraph 49 makes it clear that relevant policies for the supply of housing should be not considered up-to-date if a five-year supply of deliverable housing land cannot be demonstrated.
19. The Council in its statement indicates that it cannot deliver such a five-year supply, although it has set out in some length the efforts that it has sought to deliver this through the submission of the South Cambridgeshire Local Plan (SCLP). The Inspectors appointed to examine this plan and the Cambridge Local Plan indicated in May 2015 that they had a number of issues including as to how the housing need had been derived and whether it had taken account of

- the advice in the national Planning Practice Guidance (the PPG) as to market signals. This has led to the examination being suspended and further modifications being published in December 2015.
20. The Council has also indicated that if looked at in the wider Cambridge City and South Cambridgeshire area, a five-year supply of housing land can be shown, and point to the Memorandum of Understanding between the two Councils relating to the Greater Cambridge Joint Housing Trajectory. However, as my colleague Inspector in the appeal relating to land to the west of Cody Road, Waterbeach², also in South Cambridgeshire, made clear, paragraph 47 of the Framework is directed to each Local Planning Authority and this is not a case where a joint Local Plan has been submitted for consideration. I agree with this analysis. Therefore there is a requirement that each Local Planning Authority individually needs to show a five-year supply of housing land.
 21. I would accept that the SCLP is further advanced than was the situation when the Cody Road, Waterbeach appeal was determined in 2014, and is thus due more weight than at that time in line with paragraph 216 of the Framework. However, as the Inspectors have yet to report there are still unresolved objections. This means that the policies in the SCLP can still only have limited weight. Having said that, the policies in the SCLP are similar to those in the SCS and DCP, although Swavesey is indicated as a "Minor Rural Centre" where developments of up to an indicative maximum of 30 dwellings will be permitted within the development framework.
 22. On the basis that a five-year supply of housing land cannot be demonstrated policies which relate to the supply of housing must be considered to be out-of-date in the terms of the Framework and should be given limited weight. Therefore, in line with paragraph 14 of the Framework planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework taken as a whole. For completeness this site is not one where any of the specific policies set out in footnote 9 of the Framework apply.
 23. In assessing which policies relate to the supply of housing land it is clear that policies which restrict development in the countryside fall within this category. It also seems to me that a policy which limits the number of dwellings on a site inside a village framework is also a policy which relates to the supply of housing. However, as the majority of this site lies outside the village framework of Swavesey Policy ST/6 would not be engaged for that part. Furthermore, for that part of the site within the village framework, only two dwellings are proposed and thus would comply with Policy ST/6 for that part.
 24. Both main parties agree that Policies DC/2 and DC/3 do not relate to the supply of housing land and I also agree. However, they disagree as regards Policy NE/4. In my view Policy NE/4 does not represent a policy for the supply of housing land as it deals with whether a proposal would be appropriate within the landscape, in the same way as if it had a suitable design as required in Policy DC/2, and does not constrain housing supply of itself. All three policies would be in general conformity in intent with the relevant sections of the Framework, even so some are written in negative form. Therefore in line with paragraph 215 of the Framework can be given due weight.

² APP/W0530/A/13/2207961, paragraph 41

Character and appearance

25. Insofar as providing housing on this open field would result in an urbanisation of this area of land it would be detrimental to the character and appearance of the area and thus be harmful to the intrinsic character and beauty of the countryside contrary to the core planning principle set out in paragraph 17 of the Framework. The issue is the degree of that harm.
26. At the site visit I drove and walked around Swavesey and noted that the majority of building is laid out as frontage development. This is particularly true in the Boxworth End part of the village. This represents the character of the area and what makes it locally distinctive. However, there is some development in depth back from the historic road pattern in particular a short way to the north along Middle Watch and the Swavesey Village College extends significantly back into its site, and this is noticeable through the visibility of the rugby posts on the pitches on the south side of the College buildings.
27. There are a number of small developments which extend into the countryside in depth, and the Council has commented on these as well as the slightly more historic developments in the northern part of the village. These developments in depth do make up part of the existing character and are identified within the District Design Guide as commonplace in fen edge villages.
28. Thus while development would be out of character with the pattern of development in this immediate area, it would not be so discordant in the slightly wider area that it would be significantly harmful or have an unacceptable adverse impact on the overall village character.
29. As noted above, the site lies within the Bedfordshire and Cambridge Claylands National Character Area. The characteristics of this are set out in the submissions, but I note in particular that the landscape characteristics of this include a broad, gently undulating lowland plateau, with large rectilinear fields, and scattered woodland. Towns, villages and linear settlements are widely dispersed giving a rural feel, and fen-edge villages are often in linear form along roads. While the wider landscape is of these larger fields, the fields closer to Swavesey seemed to me to be smaller in scale.
30. In support of the application, the appellants' provided a Landscape and Visual Impact Assessment of the proposal which was commented on by the Council's Landscape Officer. Both agree the overall sensitivity of the existing landscape resource as moderate, the landscape character area has a moderate to minor value and a moderate condition and therefore would tolerate some change. I concur as to this sensitivity for the same reasons.
31. The Assessment considered a number of viewpoints and both main parties agree that the magnitude of change to the north and east would be negligible. The Council's concern relates to the views to the south and west and particularly from viewpoint 5 at Scotland Drove Mobile Caravan Park on the Rose and Crown Road looking north to northeast. This was assessed by the appellants as having high magnitude of visual impact during construction and moderate upon completion. This analysis is subject to the retention and enhancement works along the south and west boundaries.
32. However, the Council considers that the hedgerow would be insufficient to mitigate landscape and visual harm and that additional native buffer planting

should be included along these south and west boundaries. This is because the hedgerow is of insufficient height to screen any new dwellings. It is noticeable that the appellants' landscape consultants recommended planting off site, but this was not followed through in the submission or illustrative layout.

33. At the site visit I viewed the site from the main viewpoints and in particular from viewpoint 5. In visual terms the appeal site would appear intrusive into the landscape and I agree would have a moderate effect once completed. As an outline application the layout is not fixed, although I am conscious that this proposal is for a specific number of dwellings and any layout would have to accommodate this. However, as an outline application there should be sufficient flexibility in layout or mix of house sizes to allow for additional landscaping to be provided on site along the south and west boundaries, particularly if the on-site public open space did not need to be provided in line with the Planning Obligation. This can be secured as part of any reserved matters approval.
34. If this landscaping were to be provided this would mitigate the effect of the development on the appearance of the area. Consequently the proposal would comply with Policy NE/4 of the DCP in that it would respect and retain the local character and distinctiveness of the Landscape Character Area. It would also comply with Policy DP/2 of the DCP in that it would preserve the character of the local area.

Precedent

35. It is a long established principle that each planning application should be determined on its individual merits based on the planning considerations applicable at the time of the decision. However, where a proposal could be used to justify a proposal on another piece of land and that development would cumulatively add to harm then this may weigh against an initial development.
36. The Council has specifically referred to the area of land to the north of the appeal site. The appeal site and the land to the north were put forward as a site in the Council's Strategic Housing Land Availability Assessment (SHLAA) drawn up as part of the SCLP preparation. This wider site was rejected from the SHLAA on the basis that it would have an adverse effect on the landscape and townscape setting of Swavesey and would have an adverse effect on the setting of several Grade II Listed Buildings. It was also considered that the wider site would result in the loss of existing landscape features and detract from views of Swavesey.
37. As I understand, the wider SHLAA site has been withdrawn from consideration, but this does not mean that it would not be put forward at a later date for reconsideration. It is rare that the issues relating to two sites are identical in consideration, particularly as here the issue of land supply is material to my decision. The main parties concur that this proposal would preserve the settings of the Listed Buildings. From this comment it is clear that there are differences between this site and the wide SHLAA land. I am therefore satisfied that there are sufficient differences between the two sites so that the granting of planning permission for the appeal site would not compromise any decision making on the land to the north, which, if an application were to be submitted, must be considered on its own merits.

Infrastructure

38. Regulation 122 of the Community Infrastructure Levy Regulations (CIL Regulations) states a planning obligation may only constitute a reason for granting planning permission if the obligation passes three requirements. This is reiterated in paragraph 204 of the Framework. These requirements are that the obligation is necessary to make the development acceptable in planning terms, that it is directly related to the development and fairly and reasonably related in scale and kind to the development.
39. Regulation 123 of the CIL Regulations also states a planning obligation may not constitute a reason for granting planning permission for the development to the extent that the obligation provides for the funding or provision of relevant infrastructure where five or more separate planning obligations provide for the funding or provision of that project or provide for the funding or provision of that type of infrastructure.
40. As noted above I have been provided with a copy of a Planning Obligation to the Council and County Council dealing with various matters. I note that the Obligation is drafted so that should I conclude that any obligation is incompatible with any of the above tests then that element of the obligation will cease to have effect.
41. The first matter deals with the provision of affordable housing which does not represent 'infrastructure' for the purposes of the CIL Regulations. This would provide for 12 of the dwellings to be affordable. The Strategic Housing Market Assessment indicates that there is a need for affordable housing within the area. The Obligation is thus necessary to ensure that the proposal meets this need. It also complies with Policy HG/3 of the DCP which seeks 40% or more affordable housing on sites of two or more dwellings.
42. The second matter in the Obligation deals with Open Space. DCP Policy SF/10 requires all residential developments to contribute towards Outdoor Playing Space, including children's play space, formal outdoor sports, and informal open space in accordance with Policy SF/11. The evidence in front of me indicates that there is a deficiency of all these in the area and to ensure that the proposal does not exacerbate these deficiencies I consider contributions are necessary. The Council has adopted a methodology in the Open Space in New Developments SPD as to how contributions are derived to ensure consistency. This is acceptable in terms of the PPG.
43. The Council has explained that in the current situation, with a lack of a 5-year supply of housing land, has meant it has had particular difficulties in delivering larger infrastructure schemes, such as playing fields, as individual schemes are of insufficient size to deliver a comprehensive scheme. To this end the Planning Obligation sets out a "cascade" approach, with the Obligation requiring the owners to offer to the Swavesey Parish Council the recreation field as a playing field. If this is accepted then the relevant and otherwise necessary financial contributions, namely off-site Outdoor Sports Contribution, and the Children's Playspace Contribution would not be made. In addition, there would be no on-site Informal Open Space, Informal Children's Playspace or Formal Children's Playspace provided. However, if the Parish Council declined to accept the recreation field then these requirements would be delivered.

44. It seems to me that this is a practical response to the situation. Instead of taking contributions for individual projects the delivery of the recreational field on its own would be reasonably related in scale and kind to the development and, as the occupiers of the dwellings would add to the need for playing fields, be directly related. The provision of the recreation field or on-site projects would be the first contribution towards such a project and the Council has confirmed that in respect of the off-site schemes it has not received five community infrastructure contributions. The Obligation would therefore comply with Regulation 123 of the CIL Regulations.
45. The third matter in the Obligation deals with contributions towards Education. The County Council has confirmed that there is insufficient capacity at Early Years, Primary and Secondary levels to accommodate the additional pupils being derived from the development, and I note the concerns of the Parish Council, local residents and the representative of the school on this matter. Contributions are therefore necessary in planning terms to ensure that this deficiency is not made worse, and the County Council has confirmed that expansion is planned. Again there are standard methodologies to ensure that the contributions are reasonably related in scale and kind to the development. The County Council has also confirmed that no more than five planning obligations are providing contributions towards these projects. This element of the Planning Obligation therefore complies with Regulations 122 and 123 of the CIL Regulations.
46. The fourth matter in the Obligation provides a contribution towards Household Waste Receptacles. These are not infrastructure and would therefore not be subject to Regulation 123 of the CIL Regulations. Policy DP/4 of the DCP requires the delivery of such receptacles. As I have no evidence to the contrary it seems that this requirement is necessary to ensure that the proper delivery of the scheme and thus this part of the Obligation is necessary.
47. The final matter in the Obligation provides a contribution towards the Council's Monitoring costs associated with the Planning Obligation. However, it seems to me that the lack of a monitoring of the contributions or physical infrastructure is not necessary to make the development acceptable in planning terms. Consequently this provision, only, would not comply with Regulation 122 of the CIL Regulations and therefore I am giving this element no weight in my decision.
48. Overall, therefore, the proposal would comply with DPD Policy DP/4 which indicates that planning permission will only be granted for proposals that have made suitable arrangements for the improvement or provision of infrastructure.

Other matters

49. Third parties have raised concern that the site may be susceptible to flooding. However, I note that the site lies within Flood Zone 1 which is defined as having a less than 1 in 1,000 year annual probability of flooding and is thus suitable for all land uses as set out in the PPG. On this basis, and as the Environment Agency has not raised any objection, I am satisfied that planning permission should not be withheld. However, I am conscious that the concerns relate to surface water flooding. Therefore, taking into account the comments of the Lead Local Flood Authority to ensure that discharge levels remain at the Greenfield rate to protect adjoining land, conditions should be imposed to

provide details of drainage including on-site balancing. The retention of the on-site pond and wetland facilities would also protect the Great Crested Newts and other ecology on site.

50. I am also conscious of local concerns regarding existing traffic issues, but note that the Local Highway Authority has not objected to the proposal subject to conditions. A Highways Impact Statement was submitted by the appellants, which concluded that a proposal of up to 45 dwellings could be accommodated with only minimal traffic increases and no significant off site impacts on flows. I am therefore satisfied that, based on the amount of traffic that the proposed development might generate, the proposal would not result in severe residual cumulative impacts in the area to the extent that, in line with paragraph 32 of the Framework, development should be prevented or refused.
51. At the application stage the Local Highway Authority indicated that it would be seeking a financial contribution towards sustainable transport improvements, but at the appeal stage this has been clarified so that instead the footway outside the site at Boxworth End would be widened. This would ensure that the footway would be useable by all non-vehicular users and to this end this provision is necessary. A preliminary scheme has been drawn up and I have been provided with a drawing and a suggested condition to ensure its delivery. It seems to be that a condition to deliver this necessary improvement prior to the first occupation of any dwelling would be necessary to ensure that the scheme complies with DCP Policies DP/2, DP/3 and DP/4 which seek that development is accessible for all sections of the community and enhances pedestrian infrastructure. I have drafted the condition (number 16) to require the delivery of the infrastructure as the mechanism of its delivery is covered by other legislation.

Planning Balance

52. While the proposal would be contrary to the terms of the development plan in that it would represent development in the countryside, due to the lack of a five-year supply of housing land the relevant policies in the development plan identified in this decision in respect of the supply of land for housing cannot be considered up-to-date. While contrary to the policies of the emerging development plan for the same reasons, this plan also can only be given limited weight for the reasons set out above. The proposal would provide a significant benefit as it would provide additional housing to address the identified shortfall, and a significant proportion of these would be affordable introducing additional weight.
53. The proposed scheme would therefore be beneficial in both the economic and social roles of sustainable development as set out in paragraphs 7 and 8 of the Framework. While there would be some harm to the local environment this can be mitigated by additional on site planting. I am satisfied that there are identifiable differences between this site and land to the north so that the proposal would not set an undesirable precedent. Consequently, it has not been demonstrated that the proposal would be significantly and demonstrably harmful when assessed against the policies in the Framework taken as a whole, and on the evidence before me I consider that the proposal would represent sustainable development for which a presumption in favour is set out in the Framework.

Conditions

54. I have considered the conditions put forward by the Council against the requirements of the PPG and the Framework. The conditions referred to by numbers are those in the Schedule attached to this decision.
55. A number of the conditions suggested, such as that relating to materials, landscaping and on-site car parking should be properly considered at the reserved matters stage. I am not satisfied that details of fire hydrants or the discharge of surface water on to the public highway are necessary to be approved as these matters are covered under other legislation. For the same reason I do not consider there should be any restriction on burning on site. It has not been shown to me that pile foundations would be used so a condition requiring a method statement in the event that they are is not necessary. The Council's Environmental Health Officer did not recommend a condition relating to contaminated land and I too consider that this is not necessary as there is no evidence that there are previous uses which could be suspected as potentially giving rise to contamination.
56. In addition to the standard reserved matters and timescale conditions (1, 2 3), I have imposed conditions relating to ecological enhancement and the protection of Great Crested Newts to comply with the requirements of the development plan and Framework relating to nature conservation (5, 6, 7, 8). These matters need to be resolved prior to development taking place so as protect these features. Similarly, a condition ensuring that a scheme of lighting is approved is needed to protect bats (9). A condition requiring the investigation and recording of archaeology is necessary to record the history of the site in line with paragraph 128 of the Framework (10). Again this needs to be completed prior to development taking place to ensure that the archaeology is recorded.
57. Given the proximity to existing adjoining properties conditions restricting when construction work can take place on site (11) and a traffic management plan (12) are necessary to ensure that the occupiers of those properties are not adversely affected by construction operations in line with paragraph 17 of the Framework. This needs to be agreed prior to development taking place.
58. As access is not reserved conditions are required to ensure that appropriate visibility splays to Boxworth End are provided before any dwelling is occupied (13, 14) and a surface water drainage scheme is required to address flood risk (15).
59. Otherwise than as set out in this decision and conditions, I have imposed a condition specifying the relevant drawings as this provides certainty (4). Where necessary and in the interests of clarity and precision I have altered the conditions to better reflect the relevant guidance.

Conclusion

60. For the reasons given above I conclude that the appeal should be allowed.

Robert J Jackson

INSPECTOR

Schedule of Conditions

- 1) Details of the appearance, landscaping, layout, and scale, (hereinafter called "the reserved matters") shall be submitted to and approved in writing by the local planning authority before any development begins and the development shall be carried out as approved.
- 2) Application for approval of the reserved matters shall be made to the local planning authority not later than three years from the date of this permission.
- 3) The development hereby permitted shall begin not later than two years from the date of approval of the last of the reserved matters to be approved.
- 4) The development hereby permitted shall be carried out in accordance with the following approved plans: 214254 DWG 100 and F14183/01 revision A.
- 5) No development shall take place until a scheme of ecological enhancement has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include details of the features to be enhanced, recreated and managed for species of local importance both in the course of development and in the future. The scheme shall include details of the number and location of bat boxes and wetland planting and a timetable for implementation of the approved measures. The scheme shall be carried out prior to the occupation of any part of the development.
- 6) No development shall take place until a scheme of mitigation for Great Crested Newts has been submitted to and approved in writing by the Local Planning Authority. The scheme of mitigation shall accord with, but not be limited to, the details provided in the letter by Applied Ecology dated 4 September 2015 and include a timetable for the implementation of the proposed mitigation measures. The scheme shall be implemented in accordance with the approved details.
- 7) No development shall take place until the details of the proposed balancing pond including dimensions, depth and gradient of slope of the pond have been submitted to and approved in writing by the Local Planning Authority. The balancing pond shall be constructed in accordance with the details approved and timetable agreed by the Local Planning Authority and shall thereafter be maintained.
- 8) No development shall take place until a Management Plan detailing the measures to be applied to the proposed balancing pond and surrounding area, to ensure that it serves its drainage function and provides habitat enhancement and amenity, has been submitted to and approved in writing by the Local Planning Authority. The Management Plan shall include, but not be limited to, the details provided in the letter by Applied Ecology dated 4 September 2015. The Management Plan shall be implemented in accordance with an agreed timetable thereafter.
- 9) No external lighting shall be provided or installed within the site other than in accordance with a scheme which has been submitted to and approved in writing by the Local Planning Authority.
- 10) No development shall take place within the site until a programme of archaeological work has been implemented in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority.

- 11) No construction site machinery or plant shall be operated, no works audible at the site boundary shall be carried out and no construction related deliveries taken at or despatched from the site except between the hours of 0800-1800 Monday to Friday, 0800-1300 Saturday and not at any time on Sundays or Bank Holidays.
- 12) No demolition or construction works shall commence on site until a traffic management plan has been agreed in writing with the Local Planning Authority. The plan shall provide details of:
 - (i) Movements and control of muck away lorries (all loading and unloading shall be undertaken off the adopted highway);
 - (ii) Contractor parking, all such parking shall be within the curtilage of the site and not on the street;
 - (iii) Movements and control of all deliveries (all loading and unloading shall be undertaken off the adopted public highway); and
 - (iv) Control of dust, mud and debris, in relationship to the functioning of the adopted public highway.
- 13) Prior to the first occupation of the development, visibility splays shall be provided each side of the vehicular access in full accordance with the details indicated on the submitted plan No: F14183/01 revision A. The splays shall thereafter be maintained free from any obstruction exceeding 0.6 metres above the level of the adjacent highway carriageway.
- 14) Before any dwelling is occupied 2.0m x 2.0m pedestrian visibility splays on either side of the entrance with Boxworth End are to be provided in accordance with drawings that have been submitted to and approved in writing by the Local Planning Authority. These areas shall thereafter be kept clear of all planting, fencing, walls and other obstructions exceeding 600mm high.
- 15) The development hereby permitted shall not commence until details of the detailed design, implementation, maintenance and management of a surface water drainage scheme have been submitted to and approved in writing by the Local Planning Authority. Those details shall include:
 - (i) Information about the design storm period and intensity (1 in 30 & 1 in 100 (+30% allowance for Climate Change)), discharge rates and volumes (both pre and post development), temporary storage facilities, means of access for maintenance, the methods employed to delay and control surface water discharge from the site, and the measures taken to prevent flooding and pollution of the receiving groundwater and/or surface water.
 - (ii) Flood water exceedance routes, both on and off site;
 - (iii) A timetable for implementation; and
 - (iv) Site Investigation and test results to confirm infiltration rates.
- 16) Prior the occupation of any dwelling the highway works to widen the footway outside the site to 2m width shown in principle hatched red on drawing F14183/01 revision A shall have been completed.

END OF SCHEDULE

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