



To: Executive Councillor for Planning and Sustainable Transport
Report by: Head of Planning Services
Relevant scrutiny committee: Development Plan Scrutiny Sub 29/05/2012
Wards affected: All Wards

Strategic Housing Land Availability Assessment (SHLAA) -Issues & Options Stage of The Local Plan Review.
Non Key Decision

1. Executive summary

- 1.1 The National Planning Policy Framework 2012 requires Local Authorities to produce a Strategic Housing Land Availability Assessment (SHLAA) to form part of a robust evidence base to inform the production of Development Plan Documents. The main purpose of the SHLAA is to assess the amount of land that may be available for new housing in Cambridge over the next 20 years in order to inform the review of the Cambridge Local Plan. It is important to note that the SHLAA does not allocate land for development, or determine whether planning permission would be granted for housing development on a site.
- 1.2 Future housing provision will be set locally through the review of the Local Plan which will need to balance housing need and demand against the capacity of the area to accommodate new development. This will need to ensure that any housing proposal sites are deliverable. Technical work on the SHLAA prepares the way for this work. The review of the Local Plan will also need to balance housing pressures against pressure for the development of other uses such as employment.
- 1.3 Following the Issues & Options consultation in June –July 2012 there will be a further public consultation on sites for all land uses as part of the Local Plan Review.
- 1.4 This report seeks members agreement to the response to the representations, the assessment of sites put forward in the call for sites and other updates since July 2012.

2. Recommendations

- 2.1 This report is being submitted to the Development Plan Scrutiny Sub-Committee for prior consideration and comment before decision by the Executive Councillor for Planning and Sustainable Transport.

- 2.2 The Executive Councillor is recommended to:
- a) agree the response to representations on the draft SHLAA (Appendix A)
 - b) to agree the SHLAA document (Appendices B & C) in advance of consultation commencing the consultation on Issues & Options Stage of the Local Plan Review.
 - c) publish the SHLAA on the Council's web site and write to all consultees who made representations and landowners who submitted sites.
- 2.3 Appendix C is too large to attach to the agenda. A printed copy has been placed in the Member's Room for reference. All documents are published on the Council's web site with the agenda documents.

3. Background

- 3.1 The SHLAA was originally a requirement of national Planning Policy Statement 3 Housing PPS3, which has now been replaced by the National Planning Policy Framework. The National Planning Policy Framework still makes reference to SHLAA's and the responsibility of local planning authorities through evidence work to identify a 5 year supply of deliverable sites and a longer term supply of developable sites or broad locations for future housing growth. The main purpose of a SHLAA is to assess the amount of land that is potentially available for new housing in the future. This is part of the requirement for local planning authorities to plan, monitor and manage the supply of housing.
- 3.2 The SHLAA has been prepared in accordance with government best practice guidance published by CLG in 2007.¹ This sets out a 10-stage process to assess sites in a SHLAA. The main report in Appendix A follows this approach.
- 3.3 The primary role of the SHLAA is to:
- identify sites with potential for housing;
 - assess their housing potential; and
 - assess when these sites are likely to be developed.
- 3.4 The structure of the SHLAA is:-
- a) Part 1 Main Report detailing the methodology and conclusions Part 2 Annexes (Appendix B)
 - b) Part 3 Potential Sites Full Assessments and Maps of all SHLAA sites (Appendix C)

The NPPF encourages LPA's to boost the supply of housing to meet the full objectively assessed needs for market and affordable housing in the housing market area. In addition to the requirement for local planning authorities to identify a rolling five-year supply of deliverable housing sites, there is an additional buffer requirement of 5% to ensure choice and competition in the market for land.

- 3.5 The SHLAA guidance requires sites to be considered deliverable or developable. To be considered **deliverable** (that is it could be brought forward and built in the first 5 years of the Plan), sites should:-

¹ Strategic Housing Land Availability Assessments –Practice Guidance –CLG 2007
(<http://www.communities.gov.uk/publications/planningandbuilding/landavailabilityassessment>)
Report Page No: 2

- **Be available** – the site is available now is free of any legal restrictions, such as restrictive leases or covenants, and the land owner is keen to develop the land for residential purposes and doesn't want to keep the land in its current use or use it for another purpose.
 - **Be suitable** – the site offers a suitable location in planning terms for development now and is free of known planning constraints;
 - **Be achievable** – there is a reasonable prospect that housing will be delivered on the site within five years. The development is viable and there are no cost, market or delivery factors to prevent houses being built and sold.
- 3.6 To be considered **developable** (likely to come forward within 6-10 years or where possible 11-15 years. Sites should be in a suitable location for housing development; the development is viable, and there should be a reasonable prospect that the site is available for, and could be developed at the point envisaged.
- 3.7 The guidance in the National Planning Policy Framework now introduces a slight change of emphasis on viability and deliverability. The approach is however broadly the same as that advocated in the SHLAA guidance which under achievability required a judgement to be made about economic viability and the capacity of a developer to complete and sell the housing over a certain period.
- 3.8 The Council has identified and undertaken a suitability assessment of a large number of sites as either being deliverable, developable or not developable. These assessments have been subject to consultation including consultation with landowners and developers to check if there is any interest on the part of landowners in development and whether such development is developable and deliverable. As part of this and in accordance with the guidance the Council set up a Housing Market Partnership (HMP). The HMP is made up of house builders, developers, social housing providers and others and can assist in ascertaining whether sites are developable and deliverable, as well as any mitigation measures associated with the development of particular sites. The HMP met six times during the preparation of the SHLAA. Subject to the HMP meeting one more time to consider any new work the Council may undertake on viability it agreed that it would be difficult for them to meet following the consultation and call for sites owing to potential for conflicts of interest to arise.
- 3.9 By identifying sites as deliverable / developable in the SHLAA this allows the Council to count those dwellings that could be built on these sites and contribute to future housing provision. The SHLAA is an important source of technical evidence to inform plan making in Cambridge, but **it does not allocate land for development, make decisions about planning policy such as the review of the Green Belt or determine whether planning permission would be granted for housing development on a site.** It is for the formal planning process to make the final decision as to whether development should take place on a site.
- 3.10 The Local Plan will review this figure in conjunction with a broad range of other evidence that informs housing need. For now the SHLAA has used this provisional figure to guide its assessment.
- 3.11 A further update to the SHLAA will be needed towards the end of the year alongside preparing the draft Local Plan. The SHLAA will be updated in this way at key stages in the preparation and examination of the Local Plan Review to

ensure it keeps track of the completion of new development on the ground and it is based on the most up to date information The latest version will be maintained on the Council's Web site.

Methodology

- 3.12 The methodology for the SHLAA is set out in Section 5 of the draft SHLAA report at Appendix A. Stage 7a on page 18 describes assessing the suitability of sites. Potential sites were selected through an extensive desktop exercise using aerial photography, GIS mapping, planning records, constraint designations, the Local Plan, liaison with other Council departments and sections, and the previous Urban Capacity Study. All sites identified were visited where they were publicly accessible. In accordance with the guidance, the Council contacted key stakeholders as part of a call for sites in May 2008. A density methodology was devised and consulted upon in February 2009.
- 3.13 The Site Assessment Criteria and a rigorous three-stage assessment methodology was agreed by Development Plan Steering Group in July 2009 and consulted on between July and August 2009. Consultees on this and the density consultation are listed in Annex 8 to the draft report. The Site Assessment Criteria comprised 43 planning and environmental criteria, which were used to sieve sites. These are detailed in Annex 1. Each stage contained a number of criteria. Level 1 covered strategic considerations such as Green Belt and flooding constraints, Level 2 more local environmental constraints such as protected open space, and tree preservation orders, and Level 3 sustainability access to facilities and design considerations.
- 3.14 Minor amendments were made to the criteria following this consultation and were agreed by the Executive Councillor, Chair and spokes. Sites were then assessed against these agreed criteria. The purpose of the three-stage approach is to filter out poorly performing sites through a series of considerations that move from the fundamental constraints of Level 1 to the more detailed site-specific criteria of Level 3. Sites have been scored using a traffic light system as outlined in figure 1 below. Sites that have passed Level 1 are then subject to more detailed testing against the Level 2 and Level 3 criteria. Sites that pass Level 2 would then be subject to more detailed testing against the Level 3 criteria.
- 3.15 If a site scores a red 'site is not developable' for any of the criteria, it should not be considered as having potential for housing in the SHLAA and will not proceed to being assessed against the next Level of criteria. Where a site scores amber against one or more of these criteria, this does not necessarily mean that the site is not developable but detailed appraisal of the significance of the site in its local context will assess any constraints on the site and identify potential mitigation measures to overcome these constraints. This would fall to any prospective developer as part of the planning application process. However it could be that a site that gets a number of amber scores could be judged to mean that it is unrealistic to consider the site developable. This does have the potential to affect the deliverability of a site.

Figure 1: SHLAA Suitability Assessment Criteria Scoring System

KEY	LIKELY EFFECT
Red = r	The site is not developable.
Amber = a	The site may be developable subject to detailed justification and mitigation measures to enable acceptability of detailed development proposals.
Green = g	The site is developable.

- 3.16 In light of the significant housing pressures in Cambridge, the site identification exercise carried out has attempted to identify as many sites as possible before making an initial assessment as to whether they were developable or not. There has been no lower size limit on sites identified.
- 3.17 Sites identified in the 2002 Urban Capacity Study that have not been developed, allocated or identified in the SHLAA have been reassessed against the methodology used in the SHLAA. This accords with the national practice guidance.
- 3.18 The SHLAA considers a range of different types of site such as vacant and derelict land and buildings, surplus public sector land, land in non-residential uses such as car parks and commercial premises, additional opportunities in housing estates such as under used garage blocks, open space that doesn't meet the Local Plans criteria to justify protection.
- 3.19 Whilst the Council had regard to critical constraints within the SHLAA criteria such as Green Belt, open space meriting protection, sites in the flood plain (Flood Zone 3b), private gardens, and protected industrial land identified in the Employment Land Review (unless they have been carried forward from the Urban Capacity Study or included from the call for sites) they did not avoid assessing sites which fell into these categories. These constraints are consistent with the SHLAA Practice Guidance, the adopted Local Plan and other national guidance. These constraints did not prevent full assessment of sites against other criteria and did not overly restrict the assessments.
- 3.20 All appropriate sites in the Council's own 3-year rolling Housing programme have been considered in the SHLAA, and as new sites are added to the programme they will be incorporated into the SHLAA as appropriate through the annual review.
- 3.21 891 sites were originally identified from a range of potential sources for assessment between 2008 and 2011. They were all subjected to a desktop assessment against the agreed Site Assessment Criteria to assess **suitability** and were also the subject of a site survey. A number of exclusions were applied to separate out sites already built out or in the planning system which reduced the number to 754. 570 of these were found to be small sites likely to generate less than 10 units (Local Plans do not normally allocate sites below this level). Since July 2011 the remaining 184 sites have been assessed by the Council and the Housing Market Partnership (HMP). A further 22 sites were re classified as small by the HMP. The Council has also approached landowners to ascertain the likely **availability**. In all 162 remained after this analysis. **28 of these sites were found to be suitable available and achievable**. These were the subject of the public consultation in September 2011 (see below) along with 134 sites which were

considered unsuitable for development or sites too small to be allocated individually within the Local Plan. A fresh call for sites was initiated alongside the consultation.

Approach to Density

- 3.22 The SHLAA Practice Guidance suggests that a design-led approach can be used to assess housing potential on particular sites and using sample schemes, to extrapolate the number of dwellings that are achievable to the total amount of housing that could potentially be developed.
- 3.23 However, given the very large number of sites to assess this approach was not taken initially. Instead it was considered more appropriate for consistency to use the methodology from the Urban Capacity Study², cross checked against and modified in light of recent trends in development across Cambridge. Crosschecks were also subsequently undertaken on a site-by-site basis for favoured sites using a design led approach with the Council's Urban Design Team. This methodology applies density multipliers to sites according to geographical location and accessibility and the size and shape of individual sites. A further multiplier is applied to convert assumptions from gross to net.
- 3.24 The results were then crosschecked against and modified in light of recent trends in development across Cambridge. Crosschecks were also undertaken on a site-by-site basis for favoured sites using a design led approach with the Council's Urban Design Team. These figures are shown in the assessments as constrained capacity dwelling numbers.
- 3.25 The actual number of dwellings, which might be acceptable on a particular site may be higher or lower than those generated by the assessment and it will be up to the planning application process to make a final judgement.
- 3.26 Informal stakeholder consultation was undertaken on the proposed approach to calculating density was undertaken in February 2009

Approach to small sites

- 3.27 The National Planning Policy Framework at paragraph 48 states that planning authorities may make an allowance for windfall sites in their 5 year housing supply if they have compelling evidence that such sites will consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends and should not include residential gardens.
- 3.28 The SHLAA Practice Guidance at Stage 9 allows for broad locations to be identified. These are areas where housing development is considered feasible and will be encouraged, but where specific sites cannot yet be identified. The advantage of identifying broad locations is that the community will be clear about

² The methodology is identical with the exception of a further refinement of the accessibility criteria. Whilst the Urban Capacity Study uses three accessibility multipliers, this SHLAA uses four (as above). In addition the thresholds at which they are applied have been extended to take into account the evidence that relatively small "large sites" are still able to achieve high gross densities

where future development will be directed and there will be greater certainty for developers about where development will be encouraged.

- 3.29 In dense urban areas like Cambridge built up to its boundary such sites have however contributed to the City's housing supply for many years. The SHLAA has identified and assessed over 596 other small sites and has looked at past trends in actual completions of such sites. While it is not proposing to test whether all of these specific sites are likely to be deliverable or developable they will be used to guide the general locations where such development might be considered acceptable in future.
- 3.30 The SHLAA is not currently proposing to rely upon on windfalls for the supply of housing in Cambridge.
- 3.31 Work has been undertaken to cluster the general locations of the large number of small sites, which were assessed. These are mapped in the main SHLAA document at Annex 11. The Council has also compared these with the number of actual planning consents granted and built out for small housing schemes involving less than 10 dwellings since 2001/2. This has revealed that these types of site have contributed 102 dwellings per annum over the 10 years since 2001/2. The SHLAA 's analysis of small sites it has assessed as being has revealed 800 dwellings could be delivered from this source by 2031. This is therefore not an unreasonable assumption given it only relies on about 42 dwellings per annum coming from this source and is lower than past rates.

Approach to Broad Locations

- 3.32 Stage 9 of the Practice Guidance on SHLAA's allows for Broad locations for development to be considered if sufficient specific sites to meet the 15-year target cannot be identified. These can take **three fundamental forms**:
- *Within and adjoining settlements – for example, areas where housing is or could be encouraged, and small extensions to settlements; and*
 - *Outside settlements – for example, **major urban extensions, growth points, new freestanding settlements and eco-towns.***
 - ***Residential areas where existing or proposed planning policy actively encourages additional housing, e.g. through infilling and redevelopment on small sites within the area mapped at Annex 11.***
- 3.33 Broad locations can be used to guide general locations of future development where there is insufficient long-term supply of housing land and plan making has yet to decide the precise locations of future growth.
- 3.34 Alongside the public consultation on the SHLAA held between September and November 2011 a fresh call for sites was undertaken as agreed by members in July 2011. A number of strategic sites on the edge of Cambridge were put forward. Issues relating to the principle of further development on the edge of Cambridge, and whether there are exceptional circumstances to release more land from the Green Belt, are being consulted upon as part of the Issues and Options Consultation. These sites have been evaluated in the main SHLAA document but it is not possible to conclude on their assessment at this stage as they raise broader plan making principles. South Cambridgeshire District Council also received cross boundary submissions as part of their SHLAA call for sites process.

- 3.35 The City's Issues and Options Consultation is exploring what the right level of development for Cambridge should be over the next 20 years, and alongside that it is important to explore where development should be directed. As part of this, a key issue for consideration at this stage is to explore the principle of whether there should be more development on the edge of Cambridge and whether exceptional circumstances exist to justify the release of further land from the Green Belt to meet the housing and employment needs of the area. This principle is not being addressed in the SHLAA and is instead being explored through the Issues and Options Report.
- 3.36 Given the tight administrative boundary and close interrelationship with South Cambridgeshire, both Councils will be working together to consider holistically how best to meet the needs of the wider Cambridge area, especially in relation to housing and employment. The current development strategy that came through the cooperative Structure Plan process in 2003, was based on the principle of providing as much housing as possible in and close to Cambridge to create a better balance between jobs and homes and to provide for the most sustainable development strategy that was consistent with protecting the most important qualities of Cambridge and its rural neighbours. The Councils will need to consider how best to achieve a Green Belt boundary that is compatible with long term sustainable development that will endure into the future, and whether this requires the boundary to be revisited in this round of plan making.
- 3.37 The NPPF states that the Government attaches great importance to Green Belts whose essential characteristics are their openness and permanence. Five purposes for Green Belts are set out, the key one for the Cambridge Green Belt being: "To preserve the setting and special character of historic towns". The Cambridge Green Belt is one of the few to which this criteria applies. The purposes and functions of the Cambridge Green Belt are intended to help achieve the preservation of the setting of Cambridge and its special character.
- 3.38 The current Green Belt boundary around the city was established with the expectation that its boundaries could endure beyond the end of the 2016 plan period first established by the Structure Plan, which set out broad locations for development. Given that growth strategy is at an early stage in its delivery, a key question is whether there are exceptional circumstances that would justify further alterations to the Green Belt to cover the period to 2031 and beyond
- 3.39 In order to ensure that the testing process for the local plan is robust, a comprehensive approach to reviewing the land on the edge of Cambridge has to be taken at this stage, with all locations being assessed and presented for comment as part of this Issues and Options consultation. Some of the broad locations are within the City and others straddle the boundary with South Cambridgeshire.
- 3.40 For land in the city, the broad locations considered in the Issues and Options Report cover the area between the urban edge and the administrative boundary. The only exception to this, is broad location 3, land west of Trumpington Road where a smaller area has been looked at and excludes land towards the River Cam and Grantchester Meadows. This is on the basis that this land would not be a reasonable option for development due to its significant impact on Grantchester Meadows.

- 3.41 The Council has assessed the site submissions from developers using the existing SHLAA criteria and has included summary assessments of these sites in Part 3 of this document. The Council is not concluding on the suitability, availability, and achievability of these sites as the principle of releasing any further land from the Green Belt has not been decided at this stage.
- 3.42 Questions relating to the principle of whether there should be more development on the edge of Cambridge and whether exceptional circumstances exist to justify the release of further land from the Green Belt to meet the housing and employment needs of the area are raised in the Issues and Options Report, which will be subject to six weeks public consultation.
- 3.43 The SHLAA will then revisit the conclusions on this and other strategic sites on the edge of the City.

Achievability

- 3.44 As part of the Strategic Housing Land Availability Assessment (SHLAA) the local planning authority is to assess the achievability of each site tested. Part of this exercise is to undertake a strategic level financial appraisal to determine whether the scheme is likely to be capable of being delivered. The Local Plan is currently being reviewed and this appraisal work should generally be carried out in accordance with proposed Local Plan policies.
- 3.45 The NPPF is clear that the sites and scale of development identified in the Local Plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. It states that: 'in order to ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.'³
- 3.46 The SHLAA guidance requires achievability to be tested where there is a reasonable prospect that housing will be developed on the site at a particular point in time. This is essentially a judgment about the economic viability of a site, and the capacity of the developer to complete and sell the housing over a certain period. It will be affected. It will be influenced by such factors as :-
- market factors – such as adjacent uses, economic viability of existing, proposed and alternative uses in terms of land values, attractiveness of the locality, level of potential market demand and projected rate of sales (particularly important for larger sites);
 - cost factors – including site preparation costs relating to any physical constraints, any exceptional works necessary, relevant planning standards or obligations (including CIL, minimum space standards policy, Affordable housing policy, Sustainability Code Levels), prospect of funding or investment to address identified constraints or assist development; and
 - delivery factors – including the developer's own phasing, the realistic build-out rates on larger sites (including likely earliest and latest start and completion dates), whether there is a single developer or several developers offering different housing products, and the size and capacity of the developer.

³ NPPF, para 173
Report Page No: 9

- 3.47 The Council will undertake a viability assessment on the sites and scale of potential housing and commercial development in Cambridge. This will build on viability work that has been done as part of the Cambridge and South Cambridgeshire Joint Infrastructure Study. The work will involve testing the economic viability of land identified in the Councils Strategic Housing Land Availability Assessment (SHLAA) to meet identified housing need over the Local Plan period. This work should also establish the impact of affordable housing policy and any other policy standards (e.g. code for sustainable homes, and policy options on density standards) on the economic viability of sites and it should assess the appropriate and defensible levels of charge for the Community Infrastructure Levy.
- 3.48 When completed, one of the outcomes of this work will be that it will provide the necessary strategic level financial assessment to determine the achievability of SHLAA sites. It is intended to undertake this work later in the summer alongside work developing the draft submission plan. The SHLAA will be updated accordingly at the same time.

Latest Assessment May 2012

- 3.49 To date the SHLAA has reviewed capacity already in the planning system (sites allocated, with permission and sites already completed) as well as potential new sites.
- 3.50 Initial findings are that there is a potential capacity for 12,670 dwellings to be built up to 2031 (see Table 1 below). This excludes any edge of City strategic locations which the SHLAA is unable to conclude on at present.
- 3.51 The Draft SHLAA In July 2011 identified 60 sites as being potentially suitable and developable The assessments were the subject of more specific discussion and research with land owners and a Housing Market Partnership last summer who are being asked to provide a market view of their developability. Following contact with landowners 8 of the 60 sites were found to be unavailable and a further 3 were deemed to be unsuitable on closer scrutiny by the HMP. One site on Ditton Lane moved from undevelopable to potentially developable when the landowner indicated its current use would become redundant in the longer term. The remaining 50 sites were further scrutinised by the HMP and the Council on developability and density assumptions. This resulted in 28 sites being classified a suitable and 22 sites being reclassified as small. These were the subject of the consultation in September 2011.
- 3.52 . The 2011 Call for sites added 35 new sites and a handful of resubmissions based upon changed boundaries.
- Of the 35 new sites 11 were considered developable, 5 were classified as small sites, and 6 were considered unsuitable. In addition a further 13 of the 35 sites have been added as edge of City strategic sites. The Council has not concluded the assessments of these sites as they all lie within the inner boundary of the Green Belt.
 - Officers have initiated discussions with South Cambridgeshire District Council on edge of City sites.

- These are all shown in Appendix 4 to this report and Table 4 of the main report .Full details of the suitability assessments and constraints facing these 65 sites are included in Part 3 Full Assessments in Appendix B of this report (available electronically).
- Of the 28 original suitable SHLAA sites 1 has been rejected following the consultation and 4 have been withdrawn by landowners. With 23 remaining 11 new sites have been added as being suitable following the call for sites and the public consultation making **a total of 34 sites**.
- Leaving aside the edge of City Strategic Sites the 34 remaining SHLAA sites are likely to deliver a constrained capacity **1260 dwellings** over the 19 years of the next plan to 2031. The capacity of each site is shown in the final column of Table 4 in Appendix B.

3.53 Further analysis then took place on all of the small sites identified. Two further duplicates were removed to leaving 596. All of these sites were assessed using the full suitability assessment methodology described above. This reduced the total number of suitable sites from 591 to 222. The housing capacity of these 222 sites was calculated at around **800 dwellings**. ANNEX 2A shows this capacity against each site.

3.54 Appendix D also shows accepted and rejected sites from the call for sites,. There has also been some other changes from the original 28 sites from September 2011 produced by landowners withdrawing their sites from the SHLAA. This is shown in the final comments column. Full details of all of these changes are included in Table 4 of the Main SHLAA report and full Site Assessments in Part 3.

Table 3: Potential Housing Supply Numbers

Total dwellings deliverable / developable 2012-2031

Deliverable Schemes (5 year supply) (2012/13-2016/17)	
Dwellings in urban extensions	4545
Dwellings on other allocations without permission	597
Dwellings other allocated sites with planning permission	1,268
Dwellings deliverable on large sites (Over 50) with permission (not allocated)	228
Dwellings deliverable on small sites (10-49) with permission (not allocated)	107
Sub Total	6,745
Developable Schemes (6-14 years supply) (2017/18-2030/31)	
Dwellings in urban extensions	2,732
Dwellings on other allocations without permission	611
Dwellings other allocated sites with planning permission	111

Dwellings deliverable on large sites (Over 50) with permission (not allocated)	0
Dwellings deliverable on small sites (10-49) with permission (not allocated)	0
Sub Total	3,454
Total Deliverable and Developable Commitments	10,199
Plus Commitments in reporting year of AMR 2011-2012⁴	413
Total Current Commitments	10,612
SHLAA Sites	
Dwellings on identified SHLAA sites over 9 dwellings as potentially being developable / deliverable over 19 years to 2031	1260
Future small sites estimates average of 41pa over 19 years to 2031 ⁵	800
Grand Total Commitments plus SHLAA: (rounded)	12,670

3.55 Based on providing 14,000 new homes to 2031:

- Some 10,612 homes have already been allocated or permitted in planning consents in April 2011. 6,745 of these are the 5-year supply.
- Currently identified and suitable SHLAA sites provide capacity for 1260 dwellings
- The above allowance for small sites of less than 10 dwellings could contribute 800 new homes by 2031.
- This leaves around 1,330 dwellings to be identified as part of the Local Plan Review in other locations.

3.56 The list of sites in this SHLAA (Table 4), at present has potential to contribute a constrained capacity of around 2060 dwellings 1260 of these are on sites over 9 dwellings and 800 on small sites in the broad location identified .

Public Consultation

3.57 After being approved for consultation at Development Plan Scrutiny Sub-Committee on 12th July 2011, public consultation took place on the draft SHLAA between 30th September and 11th November 2011. Around 100 statutory and other consultees identified in Annex 12 of the main SHLAA document were informed of the consultation. 67 of these consultees were Residents Associations.

3.58 In addition, the consultation material and response forms were made available at the Customer Service Centre. A mailshot was also undertaken to 4,750 residents living near the proposed 28 sites. All of the consultation material was made available on the Council's website, advertised on the front page and via Twitter. An online consultation system was utilised to allow people to submit their

⁴ **Commitments in reporting year of AMR 2011-2012⁴** These are schemes under construction and new consents in current monitoring year. The numbers are not usually counted in the AMR trajectory which is a forecast and starts one year further forward. They are nonetheless commitments to be counted in the SHLAA housing supply.

⁵ This is based on an assessment of future sites compared with a past trend of 102pa actual completions over the last 9 years.

comments via the internet, although hard copies of the response forms were made available to those who do not have access to the internet and any hard copy response forms or letters sent in by respondents were entered into the online system to make them publicly available. 44% of responses were entered directly onto the Council's online system, a further 38% were submitted by email and 18 % were returned in paper format, these were subsequently entered onto the online system by officers.

- 3.59 By the end of the consultation period, the Council had received a total of 507 separate representations made by 286 respondents: There were 111 representations in support and 396 objections to the proposals in the document. The Council has worked through all the representations and has drafted responses. Summaries of all representations and proposed responses with recommended changes to the strategy have been attached as Appendix A to this report.
- 3.60 As part of this consultation the Council initiated a fresh call for sites to identify any other land, which might be suitable for new housing development over the period of the Local Plan Review. 40 new sites were registered. One further site off Rustat Road was reassessed when a representation pointed to an error in the original assessment.
- 3.61 These are evaluated in the main SHLAA document along with the updated position on the original 28 sites. Issues raised concerning some of the more strategic submissions are being consulted upon through the Issues & Options stage.

Key Issues

Key Issue 1- RSS and Housing Targets

- 3.62 The first key issue related to concerns raised by Bidwells and Grosvenor Estates concerning the status of the housing numbers in the adopted Regional Spatial Strategy compared with the provisional housing targets being used within the SHLAA of 14,000 agreed with the Cambridgeshire Local Authorities in 2009 as part of work to update the regional strategy.
- 3.63 The level of future housing provision is being set locally now following the Localism Act 2011 and is being reviewed as part of the Local Plan Review. Although the RSS is still technically in place the 14,000 was a starting point. It is not an adopted target and it will be tested through the Local Plan review, which will set an appropriate level.

Key issue 2- Methodology and narrowing scope of SHLAA with assessment criteria

- 3.64 The second issue raised by Bidwells and Emmanuel College concerned the methodology employed within the SHLAA and the scope for the assessment to be narrowed down by existing policies designed to constrain development and that some areas such as land in the green belt and protected open space were excluded from the outset. This it was argued unduly constrains the SHLAA.

- 3.65 The Council has followed the national SHLAA guidance, which states in paragraph 38 that policy restrictions such as designations and protected areas can be taken into account and particular types of land can be excluded where justified.
- 3.66 The Council did not exclude such sites from the assessment process it merely noted that constraints such as these would make some sites unsuitable for development. The sites subject to these constraints were assessed against all other SHLAA criteria.
- 3.67 It is not the role of the SHLAA to review the Green Belt. This is a role for the Local Plan Review, should it be proven to be necessary.

Key Issue 3 Site specific issues

- 3.68 Owlstone Croft attracted 185 representations 179 of which were objections along with a further petition signed by xxx residents. The site is not suitable for traditional open market housing in terms of the impact traffic generated would have on the access to the site, the adjoining Paradise Nature Reserve and the character of the Conservation Area. It is also unachievable owing to land ownership issues. The current use provides much needed student accommodation land for which is in short supply.
- 3.69 Other sites generating around 13-18 representations each included Mill Road Depot (concerns over access, open space provision and loss of garages); Council garages south of Hawkins Road (shape of site and local parking and emergency access to the rear of the Grove School); off Derwent Close (garages in leasehold and freehold ownership and lack of willing owners); BP Garage on Cherry Hinton Road (loss of petrol station); Abbey Stadium and Cromwell Road (design and density issues).
- 3.70 The proposed inclusion of the site of the Ship public house creates an issue in relation to the potential loss of a community facility. Members will be fully aware how sensitive an issue this is and the landowner has been informed of the Council's desire to retain a facility even if it results in redevelopment within the site.

Key Issue 4 Consultation with residents

- 3.71 A handful of representations concerned the lack consultation with residents' associations on the SHLAA process. The Council has tried to be open and transparent in publicising details of its SHLAA work. As can be seen in paragraph 3.40 above 67 residents associations were consulted and a member of the Federation of Cambridge Residents Associations was asked to join the Housing Market Partnership. This together with the widespread local consultation near effected sites demonstrates that the Council has gone to great lengths to involve residents the process over and above what is normally required for a piece of evidence based work.
- 3.72 The Council also consulted residents groups and other stakeholders as part of agreeing the SHLAA assessment criteria and the approach to density consultation.

- 3.73 The SHLAA does not commit the Council to approving development on any given site. It is for the Local Plan Review to consider whether any sites are to be allocated for residential development. After this any development will have to follow usual application processes and nearby residents would again be consulted.
- 3.74 Suggested responses to all of the above issues and actions to these representations are outlined in Appendix 1 to this report.

Next Steps

- 3.75 Following DPSSC, officers will continue to refine the SHLAA as part of work on the Local Plan Review and will undertake viability assessments on preferred sites. It will then consult with the Housing Market Partnership and other stakeholders on the viability of remaining sites within the SHLAA. Owners will again be approached in discussions on viability, as well as exploring any additional measures to overcome development constraints on sites.
- 3.76 The next version of the SHLAA will be updated as part of draft Local Plan stage.
- 3.77 The government practice guidance suggests regular review and update of SHLAA's through the Council's Annual Monitoring process. Regular updates to the SHLAA will also be necessary as the Local Plan Review progresses at each of its key stages and immediately prior to any Examination.

4. Implications

Financial/Procurement

- 4.1 There are no direct financial implications arising from this report.

Staffing

- 4.2 There are no direct staffing implications arising from this report.

Equal Opportunities

- 4.3 There are no adverse equal opportunities impacts arising from this report.

Environmental

- 4.4 There are no direct environmental implications arising from this report. The draft SHLAA has considered a wide range of environmental criteria in the assessment of sites. The new Local Plan for Cambridge will assist in the delivery of high quality and sustainable new developments along with protecting and enhancing the built and natural environment of the City.
- 4.5 The implications of not identifying sufficient deliverable and developable land is that there would be a high risk that the new Local Plan would be found unsound at examination. Without a suitable supply of sites to draw from we would also be

vulnerable to planning appeals being approved by the Secretary of State in undesirable locations such as the Green Belt. The NPPF also requires us to demonstrate a 5 year supply of deliverable residential land otherwise planning applications for housing should be “considered favourably” This could lead to an increased number of appeals as developers may find it easier to challenge planning applications that are refused.

- 4.6 It is required that the SHLAA be reviewed annually in order to maintain a 5 year rolling supply of deliverable sites. The proposed way to do this is through the Annual Monitoring Report, accepting that this is likely to have some implications for staff resources.

Community Safety

- 4.7 There are no direct community safety implications arising from this report although any subsequent policies in the Local Plan will have to consider this

5. Background papers

- 5.1 These background papers were used in the preparation of this report:

- National Planning Policy Framework 2012
- Strategic Housing Land Availability Assessment: Practice Guidance.2007
- Annual Monitoring Report 2011.
- Urban Capacity Study 2002

6. Appendices

Appendix A: Public Consultation Response

Appendix B: Strategic Housing Land Availability Assessment – Main Report

Appendix C: Draft Strategic Housing Land Availability Assessment – Site Maps and Assessments (only available electronically)

Appendix D: Latest Assessment Headline Conclusions

7. Inspection of papers

To inspect the background papers or if you have a query on the report please contact:

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